Written Submission: Manor Park Golf Club

Dr Anne Alkema

My submission concerns whether the evidence in the Section 42A report adequately supports the proposed rezoning of 30 Benmore Crescent. I ask the Commissioners to examine the evidence and reasoning behind the recommendations, including the treatment of contrary evidence and alternatives raised by submitters.

I address three aspects of the Section 42A report: transparency about the author's position; the explanation of the analysis framework; and the breadth of evidence supporting the recommendations. I then consider the site's history, the wider planning context and the implications for the surrounding community.

Position statement. I am a retired researcher and evaluator and hold a Doctorate of Professional Practice in social science research. Over the last 20 years I have conducted a considerable number of research and evaluation projects, peer-reviewed research and evaluation reports, and I continue to peer review doctoral theses. It is this expertise I bring to the review of the s42A report that is the focus of the oral submission today.

I am also president of the Manor Park Golf Club and the Club's representative on the Manor Park and Haywards Residents Incorporated Society. While I am not impartial about the rezoning matter under discussion, I bring an objective lens to the technical aspects of Mr Osbourne's Section 42A report.

I acknowledge this hearing concerns rezoning, not the potential waste transfer station. However, the two are interwoven in the site's recent history and, as I discuss later, are conflated by residents. That history includes resource consents requested and agreed to over the last few years, and reports offered in evidence to this and other hearings by Rosco Ice Cream Ltd, Te Kārearea Ltd, and Waste Management NZ Ltd. It also includes the request to transfer further proceedings relating to the waste transfer station at 30 Benmore Crescent to the Environment Court.

Of interest, too, is that they are also conflated by Te Kārearea Ltd and Waste Management NZ Ltd.

In conducting this review, I have used both keyword searches and snowball methods to find and read the range of background documents related to this zoning review. These include documents used by Mr Osbourne, and those that he has not used but that have some relevance to the rezoning context.

I approach the Section 42A report through the lens of qualitative research, focusing on the trustworthiness of its findings. In social science research, trustworthiness concerns the degree of confidence, accuracy and defensibility that a study's findings hold.

Three things are key to trustworthiness: the author's stated position; a transparent analysis framework; and the evidence considered and used to inform the assessment and recommendations. From a researcher's perspective, I make the following comments on these matters.

- Firstly, I consider transparency about the author's expertise and position in relation to the subject matter. Mr Osbourne declares his expertise and impartiality. However, he does not identify the work that his employer, The Property Company, has done for Hutt City Council in relation to land in the region. Disclosure of that work would help readers assess the context

of his advice. However, the relationship alone does not establish that it influenced his assessment.

- Secondly, I consider whether the analysis framework is transparent. Mr Osbourne has thoroughly analysed and grouped the submitters' evidence into themes but has not explicitly explained his approach. Such an explanation may not be required in reports of this kind; nevertheless, its absence affects how I assess the analysis. He gives some recognition to systems thinking through references to national planning tools but gives limited attention to the regional context. His main focus is the site itself. That focus is understandable because this hearing concerns 30 Benmore Crescent. However, the site sits within a local environment of houses, green spaces and the awa. My concern is whether the various levels of the ecosystem have been sufficiently considered together.
- Thirdly, I consider whether the documentary evidence is sufficient to support the overall conclusions and recommendations. My concern is not simply that documentary evidence has been used selectively, but that the report does not adequately explain whether or how evidence contrary to its argument has been considered and weighed. This limits my confidence in the critical examination of the documentary evidence. A bibliography would also make the evidence base more transparent and allow readers to assess its breadth.

Historical context

Sections 3.3, 3.4 and 3.5 describe the site's history, and most of that account is factual and straightforward. My concern is the difference between paragraph 23, which says recent earthworks and civil works "have altered parts of it", and paragraph 143, which describes the site as "highly modified". The latter description better reflects the scale of the consented earthworks. Consent RM220258 outlines thousands of cubic metres of both cut and fill, with the fill contributing to parts of the site being built up by six metres. Figure 4 of the report shows the extent of the change.

This change is further noted in other documentary evidence not referred to in Mr Osbourne's report. For example, the extent of the change has impacted on the flood overlays. This is noted in the Section 42A Officer's Report in Hearing Stream Five where Stephen Davis acknowledges the earthworks and recommends "changing all the flood hazard overlays within the site to the low flood hazard overlay (with the exception of the stream corridor for Benmore Stream)."

Philip Lawrence in Hearing Stream Five adds to this where, as an expert witness on behalf of Te Kārearea Limited and Waste Management NZ Ltd, he requests removal of flood overlays from the site on the true left bank of Dry Creek downstream of the northernmost culvert. He notes that "as a consequence of recent earthworks… the site is now elevated well above the predicted flood level…"

Taken together, this evidence demonstrates the scale of the earthworks and the resulting physical changes to the site. In my view, those changes have stripped the site of its former rural aspect.

Within the historic context, Mr Osbourne also notes the resource consents requested and agreed to over the last four years, along with RM230019 submitted by Waste Management NZ Ltd for the waste transfer station. He notes that this has been withdrawn and deferred to the Environment Court.

The wider context

Sections 3.6 and 3.7 acknowledge the obligations and directions established at the national level through National Policy Statements. These include rezoning rural land to urban land, if necessary to meet demand for housing or business land. That direction, together with the industrial land shortage identified in the Wairarapa-Wellington-Horowhenua Industrial Land Study Report, appears to inform Mr Osbourne's conclusions. However, identifying a shortage is not the same as establishing where it should be addressed. The industrial land study notes limited industrial land supply in the Hutt Valley, but also calls for a regional and co-ordinated approach to meeting demand in other areas with greater potential for growth.

The Sustainable Growth Strategy 2025-2055 has also been used by Mr Osbourne as a rationale, noting the cultivation of well-connected economic precincts. But other aspects of this strategy are not considered. For example,

- Te Awa Kairangi and its health and mauri - noting that 30 Benmore Crescent borders the awa at the southern end.
- Promoting the wellbeing of all people that involves designing neighbourhoods and infrastructure that enhance social cohesion.
- Supporting neighbourhoods outside of the valley floor.

Somewhat ironically, Manor Park is not included on the maps of suburbs throughout this document.

Te Awa Kairangi/Hutt River Environmental Strategy, 2018 and its objectives are not referenced either. Yet there are objectives related to community and environment that should be considered given the proposed industrial zone is, as noted above, adjacent to the awa at the southern end.

The report also relies on the precedent of industrial zones adjoining residential areas in the Hutt Valley. Although the Section 42A report does not identify the suburbs, examples include Taitā, Naenae, Seaview, Petone, Moerā, Alicetown and Wainuiomata, with their historic industrial precincts. My concern is whether these are genuinely comparable to Manor Park. That comparison needs to examine their history, their proximity to Te Awa Kairangi and the social-housing context, including residents' ability to influence their surroundings. It also needs to address the contrary comparison with suburbs such as Woburn, Waterloo and Eastbourne, where I see no equivalent precedent.

In section four of the report, Mr Osbourne summarises, describes, and categorises the submitters' views thoroughly. But I do have a concern about the point he makes that many submitters have not stated why rural activities are the most appropriate or suggested alternative zones. Most submitters are from the community and are not familiar with activities related to zoning. They were asked to respond to a particular zone – not provide evidence for a zone they would like to see. However, there are submissions that ask for a zone that complements their residential zone and does not have an adverse effect on their lives.

Three submissions favour rezoning. Two also request that land within the rail corridor be rezoned from medium density residential to general industrial. This is an additional change on which, to my knowledge, the community has not been consulted. I am not familiar with the planning approach

required to change land zones along the railway corridor. I therefore ask for clarification of how this request falls within the scope of this rezoning process.

I now turn to the substantive assessment in Section Four: the evidence Mr Osbourne uses to support his recommendation for general industrial zoning. That evidence includes the submissions and selected documentary sources. My concerns fall into four areas: the relationship between rezoning and the proposed waste transfer station; the evidence of demand and consideration of alternatives; effects on the surrounding community and environment; and the proposed rezoning of the rail corridor.

- The oral submissions yesterday and Mr Osbourne's rebuttal document of 4 November 2026 make it clear that a waste transfer station is proposed for the site. I agree with paragraphs 94 and 120 that the direct referral of RM230019 is not part of this assessment and recommendation process. Nevertheless, as noted in my introduction, community submitters associate it with the Proposed District Plan process because of the recent bulk earthworks and Waste Management NZ Ltd's involvement.
- The regional alternatives discussed earlier remain relevant to this assessment. Both Te Kārearea Ltd and Mr Osbourne consider that a general rural zone does not give effect to national planning instruments requiring sufficient development capacity for expected housing and business demand. Mr Osbourne cites the regional land shortfall, but overlooks the same studies' call to explore business development options in the wider Wairarapa and Horowhenua regions.
- Paragraph 106 states that the site "could" contribute to medium-term development capacity if zoned industrial. This describes a conditional contribution rather than a definite outcome. My question is what conditions would need to be met, and what evidence supports the expectation that rezoning would deliver that contribution?
- Further, the question is how the evidence outlined in paragraphs 107 and 108 supports a shift from the conditional contribution described in paragraph 106 to the conclusion that rezoning "would" assist in meeting the requirements of the higher order planning instruments. Mr Osbourne bases that conclusion on demonstrated demand. Later, in paragraph 139, he describes other options as unduly frustrating the policy framework of the industrial zone chapters. I ask whether the evidence sufficiently explains both the greater certainty of the first conclusion and the rejection of those other options.
- The evidence of demand needs to be distinguished at two levels. In the submissions on this site, two submitters seek industrial zoning. They have made considerable investment in the site, which now makes it a location of convenience for them. That site-specific interest is distinct from wider business demand.
- Mr Osbourne notes that no evidence has been supplied about the need for a site for rural activities. I acknowledge that gap. The submitters have instead focused on the potential effects of activities allowed under industrial zoning and, as noted earlier, have conflated rezoning with the proposed waste transfer activities. Their submissions concern the impact of change and seek zoning compatible with what already exists in Manor Park.
- Mr Osbourne rejects this on two counts – the lack of detail provided by the submitters and the natural hazard exposure. This does, however, have me questioning why industrial

activities with potentially hazardous materials are permitted on a site with natural hazards such as the fault line, flood hazard overlays and the liquefaction overlay.

I now turn to the effects on the surrounding community and environment, and the evidence supporting the view that those effects can be managed.

- Mr Osbourne sees “adverse effects” generated by industrial zone activities as being able to be managed under the guidance set up to do this. However, other evidence points to the scale of the adverse effects from the current proposed activity - a waste transfer station. Evidence for this is shown in the Hutt City Council’s request for further information from Waste Management on managing adverse effects in their resource consent application RM230019 before it was deferred. In addition, JC Jones, the independent commissioner who reviewed the consent application, notes these at the individual level and then the cumulative impact of these on the community.
- The collective term “adverse effects” can obscure the specific experiences of odour, noise, traffic, vibration, and visual impact. Activity at the proposed transfer station could operate for up to 14 hours a day, 7 days a week. My concern is the duration and combined impact of those effects on residents across that operating period.
- As a precedent, the author notes in para 114 that the majority of general industrial land within the district shares a boundary with residential zones. This point is later repeated in para 120. I have covered off why this point needs closer examination above in terms of the ‘where’ and ‘why’.
- My concern is that the site’s present state is being used, alongside “the higher order direction”, as a rationale for rezoning. As discussed in the historical context, photographs show the terraforming that has removed its rural aspect. The Crown neglected the physical features that gave it that aspect while holding the land “just in case” for roading; more recently, the developer destroyed that aspect through works permitted by Hutt City Council.
- The same selective use of the Sustainable Growth Strategy 2025-2055, discussed earlier, appears here: its direction to cultivate well-connected economic precincts is relied on, while its people-related priorities are overlooked. Those priorities include:
    - Promoting the wellbeing of all people; spaces that support community health, safety and happiness; a liveable city with vibrant neighbourhoods; and supporting and enhancing the environment.
- The dismissal of a Light Industrial Zone on the grounds that “no submitters asked for it” is unusual. While it has not been asked for by the community, who do not have the in-depth knowledge of zones, they have asked for zoning that is more compatible with their environs. As such it should have been given further consideration.
- Paragraph 154 notes the submissions by WMNZ Ltd and Te Kārearea Ltd to rezone the land within the rail corridor immediately adjacent to the site from Medium Density Residential (as notified) to General Industrial. This means there would no longer be the requirement to conform to the residential zone standard for the height of buildings in relation to the boundary.
- Te Kārearea Ltd did not supply any evidence for this. WMNZ Ltd, however, has supplied some evidence in support of the request on the grounds that there is no need for the buffer given the nature of the site and its separation from residential areas. Given the paucity of

evidence, I am concerned Mr Osbourne has accepted the request. There has been no consultation with residents on this matter.

- I note the amendments that are recommended under the general rural zone provisions for what is to be called the Benmore Crescent Precinct, especially as they relate to size and distance from the boundary. Given that there has been a request to rezone the land within the railway corridor, this brings the built environment of the site closer to the houses in Manor Park.

In conclusion

Mr Osbourne has analysed the submissions thoroughly. My concern is the considerable weight given to the submissions of Waste Management and Te Kārearea. Both companies have substantial interests in the rezoning, while residents face substantial potential losses. Those differing stakes make it particularly important that the evidence supporting the recommendation is examined rigorously and that residents' concerns are weighed explicitly.

My central concern is the use of wider documentary evidence to support the acceptance or rejection of submitter requests. I find that use selective, given the significance of the decision for the site, the wider environment and Te Awa Kairangi. In my view, amenity values and the matters relating to people have not received adequate consideration. I ask the Commissioners to examine whether the evidence supporting the recommendation adequately addresses those matters, contrary evidence and the alternatives raised by submitters.

Dr Anne Alkema



10 November 2026