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 EIGHT)

PLANNING

28 OCTOBER 2026

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1. EXECUTIVE SUMMARY

1.1 This statement of evidence is prepared on behalf of Waste Management NZ Limited ("**WM**") and addresses planning matters relating to WM's submission points specific to 30 Benmore Crescent, Manor Park ("**Site**") in the Proposed Plan.

1.2 I agree with the reporting planner's recommendation for General Industrial zoning with a Benmore Crescent Precinct ("**Precinct**"), and suggest further site-specific provisions in **Attachment 1** to manage effects identified by technical experts. I have undertaken a section 32AA evaluation of the rezoning and the provisions I suggest in **Attachment 2**. It compares the proposal with retaining the General Rural Zone, a residential or mixed use zone and a Light Industrial Zone. In my opinion, a General Industrial zoning with the Precinct and associated provisions is the most appropriate way to achieve the objectives of the Proposed Plan and the purpose of the RMA. In particular, it has regard to section 6(e) of the RMA and takes into account the principles of Te Tiriti o Waitangi (section 8).

1.3 The proposed zoning and associated provisions give effect to relevant National Policy Statements. There is a shortfall of vacant industrial land in Hutt City, estimated by Mr Colegrave at 33 to 37 hectares over the next ten years. The Site would provide about 9.9 hectares of flat, well-connected industrial land suited to large-lot and yard-based activities. In this respect, industrial zoning would give effect to the National Policy Statement on Urban Development 2020 ("**NPS-UD**").

1.4 The Site does not meet the definition of highly productive land under the National Policy Statement for Highly Productive Land 2022 ("**NPS-HPL**"). It has been substantially modified, is isolated from other rural land, and in its current state has close to no rural productive capacity. A rural zone is not the most appropriate zone for the Site or for achieving the purpose of the RMA under section 32.

1.5 The technical evidence shows that the effects of industrial activities at the interface with Te Awa Kairangi corridor and the residential area at Mary Huse Grove can be managed through the precinct provisions, the district-wide provisions of the Proposed Plan and the Wellington Regional Natural Resources Plan ("**NRP**").

1.6 The site-specific provisions I suggest include landscaping, setback, building colour and lighting standards; restrictions on activities that would generate high traffic volumes or compromise the industrial use of the Site; and a rule requiring the road and servicing upgrades to be in place before activities establish. They also include one matter on which I differ from the reporting planner: restricted discretionary activity status for waste management facilities, subject to conditions. In my opinion this better gives effect to the National Policy Statement for Infrastructure 2025 ("**NPS-I**"). It still enables the effects of any such facility to be assessed through a resource consent process.

1.7 I note that the reporting planner does not support a Special Zone as sought by Te Rūnanga o Toa Rangatira in their primary submission. Dr McClean in presenting evidence on behalf of Te Rūnanga o Toa Rangatira considers an Industrial Zone with tailor made provisions (like the Precinct) is appropriate.[1] However, if the Panel were minded to consider a Special Zone most appropriate, I consider that option is also available under the National Planning Standards 2019. The provisions in that case would be those proposed for the precinct, in addition to the provisions that apply in the General Industrial zone.

2. INTRODUCTION

2.1 My full name is Angela Joy Goodwin. I am a director and principal planner at Potentialis Limited and have held this position since October 2011. I have previously prepared statements of evidence on behalf of WM relating to its submissions on matters addressed in Hearing Stream #1 (Opening), #2 (Business), #3 (Rural), #5 (Natural Hazards), #6 (Infrastructure) and #7 (Other topics) of the Proposed Plan.

2.2 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.

2.3 While not directly relevant to this Proposed Plan hearing, I am the author of the Assessment of Environmental Effects ("**AEE**") report for the application to establish and operate a resource recovery park on part of the Site. That application was lodged in early 2023. Prior to completing the AEE I provided advice to WM regarding the Site. I have made a number of site visits to the Site and surrounding area during this time.

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[1] Statement of evidence of Dr Robert McClean dated 27 October 2026 at [21] and [22].

2.4 Where I refer to the proposed park in my evidence, I refer to it as context for why industrial zoning is appropriate and as an example of the kinds of activities the Site can accommodate subject to suggested rules.

Code of conduct

2.5 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.

3. SCOPE OF EVIDENCE

3.1 This statement of evidence will:

(a) set out the background to the provisions I recommend apply to the Site;

(b) set out the relevant statutory and policy framework for the rezoning of the Site;

(c) assess the appropriateness of General Industrial zoning for the Site, including an evaluation of site characteristics, alternative zoning options, proposed plan provisions, and the management of effects;

(d) respond to submissions received on the zoning of the Site;

(e) respond to the Section 42A Report dated 12 October 2026 ("**Section 42A Report**") to the extent matters are not addressed earlier in this evidence; and

(f) provide an overall conclusion on WM's proposed rezoning of the Site.

3.2 In preparing this evidence I have read:

(a) relevant submissions and further submissions including from the Manor Park and Haywards Residents Community Incorporated Society (377) ("**Residents' Society**") and those of Te Kārearea Ltd ("**TKL**") and Rosco Ice Cream Ltd (447), Te Rūnanga o Toa Rangatira (353), the template submissions referred to in the Section 42A Report as Submitter Group A and various individual submissions;

(b) the Section 42A Report; and

(c) all other statements of evidence on behalf of WM and TKL. I have also read the statement of evidence of Dr Robert McClean on behalf of Te Rūnanga o Toa Rangatira.

4. BACKGROUND TO REZONING PROVISIONS, RELATIONSHIP TO OTHER HEARING STREAMS, RESOURCE CONSENTS AND AGREEMENTS

4.1 WM and TKL both seek General Industrial zoning for the Site, with TKL also seeking site-specific provisions. Each supports the other's primary submission and that of Te Rūnanga o Toa Rangatira.

4.2 The reporting planner recommends General Industrial zoning with a Precinct. I agree with that approach. In **Attachment 1** I suggest specific provisions to apply within the Precinct. I have drafted them to:

(a) respond to the recommendations of the technical experts on managing the effects of industrial activities on the Site;

(b) give effect efficiently and effectively to the NPS-UD and the NPS-I; and

(c) ensure that effects at the interface between the industrial and residential zones are appropriately managed.

4.3 As noted above, should the Panel consider a special zone (as sought by Te Rūnanga o Toa Rangatira) would be preferable to a General Industrial zone, the provisions in **Attachment 1** could be restructured as a special zone with the same content. My section 32AA evaluation in **Attachment 2** applies to both approaches, and the latter sections of my evidence assess them against the planning framework.

Relationship of the Proposed Provisions to WM's primary relief and other hearing streams

4.4 The suggested provisions are consistent with relief sought in WM's primary submission on other parts of the Proposed Plan, and some of them depend on that relief. If that relief is not granted, the drafting of the Precinct provisions would need to change. The following paragraphs set out the relationship between the relief WM seeks in relation to the Site and the relief sought more broadly and considered during other hearing streams.

Definitions of waste management facility and heavy industrial activity (Hearing Stream 2)

4.5 WM seeks a definition of waste management facility be added to the Proposed Plan. As I explained in my evidence for Hearing Stream 2, the absence of a definition creates ambiguity and uncertainty in consenting processes.[2] In Hearing Stream 6 I also explained that a definition would better give effect to the NPS-I.[3] The suggested Precinct provisions I propose rely on waste management facility being a defined term. As far as I am aware, the Panel has not yet heard this specific matter. It has been raised in several hearing streams, but the relevant section 42A reports have each recommended deferring it to a later hearing.

4.6 WM opposes the inclusion of waste management facilities within the definition of heavy industrial activity for the reasons set out during Hearing Stream 2 and detailed in my statement of evidence presented at that hearing.[4] If the Panel does not consider WM's relief that waste management facilities be separately defined and excluded from heavy industrial activity is warranted, I suggest alternative wording for the Precinct in **Attachment 1** that heavy industrial activities are discretionary, other than waste management facilities, which are restricted discretionary.

Natural hazards (Hearing Stream Five)

4.7 I note that during Hearing Stream 5 Mr Philip Wallace presented evidence to demonstrate that the extent of flooding shown on the flood overlay that applies to the Site was not accurate given the bulk earthworks undertaken on the Site.[5] Mr Gibson notes that in Minute 14 the Panel requested that the flood hazard mapping for the whole city be remodelled, and considers the remodelling is likely to confirm that only the Dry Creek corridor within the Site is subject to flooding. In regard to the Fault Location Area, the reporting planner for this hearing records agreement on the fault overlay alignment in a joint witness

2 Statement of Evidence of Angela Goodwin (Hearing Stream Two) dated 8 May 2026 at [13] and [28].

3 Statement of Evidence of Angela Goodwin (Hearing Stream Six) dated 7 September 2026 at [67]–[70].

4 Statement of Evidence of David Howie (Hearing Stream Two) dated 8 May 2026 at [16] and [25]; Statement of Evidence of Angela Goodwin (Hearing Stream Two) dated 8 May 2026 at [2] and [12]–[16].

5 Statement of Evidence of Philip Wallace (Hearing Stream Five) dated 5 August 2026 at [18]–[19].

statement dated 24 September 2026.[67] The site-specific provisions I suggest in **Attachment 1** do not include any matters relating to natural hazards on the Site on the basis that these matters are contained in the Natural Hazards Chapter. I do not discuss natural hazards that apply to the Site as these issues have been considered and largely resolved.

Trip generation (matter carried over from Hearing Stream Six)

4.8 During Hearing Stream Six (Infrastructure) I considered that the site-specific trip generation figure requested by TKL and supported by WM may be better addressed at this hearing.[8] To this end, the provisions in **Attachment 1** include a rule on traffic generation (GIZ-PREC1-R13). It removes the reference to resource consent RM230018 that Mr Gibson had suggested in Hearing Stream Six, and instead refers directly to the road upgrades that are part of that consent. Mr Georgeson considers there is sufficient justification for a site-specific rule.[9] He also considers that the absence of a rule would result in unnecessary duplication in assessment of consent applications in the future.

Noise measurement (Hearing Stream Seven)

4.9 During Hearing Stream Seven, when discussing the location from which noise should be measured, Mr Gibson and I considered the Proposed Plan should be clear that noise is assessed within the receiving site, rather than at the boundary of the site generating the noise. Mr Humpheson takes the same approach.[10] I highlighted that for 30 Benmore Crescent, because the rail corridor is zoned residential, measuring from the boundary of the Site would impose lower noise levels on the Site than other sites similarly located. In paragraph 7.5 of this statement I discuss the zoning of the rail corridor which WM and TKL seek be zoned General Industrial, consistent with the zoning of the Site. Mr Humpheson considers the rail corridor is not a noise-sensitive receiving environment.[11]

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6 Section 42A Report at [13(c)].

7 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [8.7]–[8.10].

8 Statement of Evidence of Angela Goodwin (Hearing Stream Six) dated 7 September 2026 at [71]–[74].

9 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [6.10] and [7.3]–[7.4].

10 Statement of Evidence of Darran Humpheson (Hearing Stream Eight) dated 27 October 2026 at [5.17]–[5.18].

11 Statement of Evidence of Darran Humpheson (Hearing Stream Eight) dated 27 October 2026 at [6.6].

Relationship to Wellington NRP

4.10 I have also made reference to the requirements of the NRP. The NRP includes rules to control the effects of stormwater generation.[12] Mr Farrant considers these sufficient to manage the effects of activities from an industrial zone.[13] Mr Gibson explains that, under Plan Change 1, creating more than 1,000 m² of impervious area in Whaitua Te Whanganui-a-Tara requires resource consent to control stormwater contaminants and discharge volumes, and that the stormwater design for the proposed resource recovery park shows these requirements can be met on the Site.[14]

4.11 The NRP also contains rules to manage the discharge of odour, dust and contaminants to air from industrial activities.[15] Ms Ryan considers there are no odour or air quality concerns that would make the application of an industrial zone to 30 Benmore Crescent inappropriate.[16] Adopting her opinion, and considering the provisions of the NRP, I do not suggest any site-specific provisions in regard to air quality on the basis these are not required.

Relationship of the Proposed Provisions to works required by granted consents

4.12 Mr Gibson provides an explanation of the consent history of the Site that includes RM220258 for bulk earthworks and RM230018 for roads and servicing.[17] Of relevance to the provisions in **Attachment 1** and the suitability of a General Industrial Zone discussed in later sections of this statement are the following:

(a) RM220258 requires 20m of riparian planting on the true left bank of Dry Creek;

(b) RM230018 was assessed and approved on the basis of up to 2,900 vehicle movements a day generated by the Site;[18] and

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12 NRP, Rules R48, R49, R50, R51 and R55; Proposed Plan Change 1 to the NRP (notified 30 October 2023), including Rules WH.R4 to WH.R13.

13 Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [1.3], [1.5] and [6.3].

14 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [7.10]–[7.16].

15 NPS, section 5.1, Rules R42, R27, and R31.

16 Statement of Evidence of Deborah Ryan (Hearing Stream Eight) dated 27 October 2026 at [5.17] and [8.2].

17 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.1]–[5.17].

18 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [6.3].

(c) RM230018 requires planting between the Site and Te Awa Kairangi, around the perimeter of the Site and between the upgraded intersection of Manor Park Road and Benmore Crescent and the State Highway 2 interchange.

Relationship of the suggested provisions to the Development Agreement for the Site

4.13 As set out by Mr Gibson, TKL, as the developer of the Site, has entered into a development agreement with NZTA as part of resource consent RM230018 authorising the roads and servicing of the Site. Part of this is that a restrictive covenant is to be registered on the record of title. Upgrades to the road network have been agreed as part of the development agreement as outlined by Mr Gibson.[19] These improvements allow the road network to cater for up to 2,900 traffic movements a day.[20] My understanding is that the reason for the covenant is to restrict activities that are high trip generating activities with the intent to ensure that the development of the Site remains integrated with the transport network.

4.14 In drafting the suggested provisions for the Precinct, my concern is to ensure the development of the Site can be serviced without unacceptable adverse effects on the road network. A consequence of this is that it makes the Precinct provisions consistent with the covenant. However, the provisions are not a mechanism to enforce the covenant and if, for any reason, the covenant was not registered on the title the provisions would, in my opinion, remain appropriate including based on my s32AA analysis including in **Attachment 2**. I summarise that analysis below.

5. KEY PLANNING PRINCIPLES AND ANALYSIS

S32AA analysis

5.1 Section 32AA of the RMA requires a further evaluation of any changes proposed since the Council's section 32 evaluation report was completed. That evaluation must be undertaken in accordance with section 32(1) to (4), but only for the changes, and at a level of detail that corresponds to their scale and significance.

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19 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.2] and [5.11]–[5.14].

20 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.4], [5.9] and [6.3].

5.2 In summary, the evaluation must examine whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (section 32(1)(a)).

5.3 It must also examine whether the provisions in the proposal are the most appropriate way to achieve the objectives (section 32(1)(b)) by:

(a) identifying other reasonably practicable options for achieving the objectives;

(b) assessing the efficiency and effectiveness of the provisions in achieving the objectives, including the benefits and costs of their effects and the risk of acting or not acting (sections 32(2) and (4)); and

(c) summarising the reasons for deciding on the provisions.

5.4 My section 32AA evaluation is in **Attachment 2**. The changes it evaluates are:

(a) rezoning the Site from General Rural Zone to General Industrial Zone;

(b) applying the Benmore Crescent Precinct (GIZ-PREC1) to the Site, as set out in **Attachment 1**. In summary, those provisions:

(i) add a Precinct objective that states the outcome sought for the Precinct and policies that aim to protect the values of Dry Creek and Te Awa Kairangi and ensure effects are appropriately managed;

(ii) provide for waste management facilities, including resource recovery parks, as a restricted discretionary activity where waste is handled and stored indoors, there is no active composting and fire, pest, and dust and odour management plans are in place, with discretionary status otherwise;

(iii) require a landscape plan for the construction of any new building (excluding ancillary buildings), certified by Council, that includes a continuous buffer along Te Awa Kairangi recreational corridor, screen planting for the Hutt River Trail and Mary Huse Grove, and a predominantly indigenous planted corridor at least 20 m wide along Dry Creek for new

buildings associated with new activities if this planting is not already in place near the activity proposed;

(iv) control the colour and reflectivity of principal buildings visible from Te Awa Kairangi recreational corridor or Mary Huse Grove, signage and exterior lighting, and require buildings, structures, outdoor storage, waste handling, parking and impermeable operational areas to be set back at least 10 m from the centreline of Dry Creek and from site boundaries;

(v) require resource consent for buildings (excluding resource recovery park buildings) over 1,000 m²;

(vi) require fire-fighting water supplies;

(vii) make residential activities, grocery stores and supermarkets, service stations, food and beverage activities and larger commercial activities more restrictive than elsewhere in the General Industrial Zone, to manage traffic generation and retain the Site for industrial use; and

(viii) include a traffic generation and transport infrastructure rule (GIZ-PREC1-R13) that requires the transport, water supply and wastewater upgrades to be operational before activities establish, and limits traffic to 2,900 vehicle movements per day (measured on a weekly average), in place of the high trip generation rules.

Whether the objective is the most appropriate way to achieve the purpose of the RMA

5.5 The changes I propose do not alter the objectives of the General Industrial Zone or General Rural Zone, which have already been evaluated through the section 32 reports for those zones. The only new objective is the Precinct objective, GIZ-PREC1-O1. In my opinion, that objective (alongside the objectives of the General Industrial Zone) is the most appropriate way to achieve the purpose of the RMA, and achieves it better than retaining the General Rural Zone, for the reasons set out below.

5.6 With regard to section 5 of the RMA, the objective enables the use and development of the Site for industrial activities, providing for the economic and social wellbeing of people and communities through employment, industrial

capacity and waste services, and for the economic and cultural wellbeing of Te Rūnanga o Toa Rangatira as landowner. It also seeks to sustain the potential of the Site to meet the needs of future generations by managing effects on the environment. A General Rural Zone would provide fewer of these opportunities.

5.7 With regard to section 6 of the RMA, of particular relevance, the objective:

(a) seeks to preserve the natural character of Dry Creek and Te Awa Kairangi and their margins, and to protect them from inappropriate use and development (section 6(a));

(b) provides for the relationship of Te Rūnanga o Toa Rangatira with Te Awa Kairangi and its ancestral land (section 6(e)), which a General Rural Zone would not provide for in the same way; and

(c) does not alter the management of natural hazards on the Site (section 6(h)).

5.8 In regard to section 7 of the RMA, the objective provides for the efficient use and development of a modified, flat and well-connected Site (section 7(b)), the maintenance and enhancement of amenity values at the interface with the recreational corridor and residential area (section 7(c)) and the quality of the environment (section 7(f)). By contrast, a General Rural Zone would make inefficient use of a Site with very little rural production value, and some productive uses could have greater impacts on freshwater values than industrial uses.

5.9 The objective takes into account the principles of the Treaty of Waitangi (section 8), including the developmental rights of Te Rūnanga o Toa Rangatira in respect of land reacquired through its Treaty settlement.21 A General Rural Zone would not reflect its aspirations for development of that land.

5.10 In my view, the following characteristics of the Site make it suitable for an industrial zone:

(a) Proximity to State Highway 2: As set out by Mr Georgeson the Site is in close proximity to State Highway 2 and the SH2/SH58 interchange.[22] This allows industrial activities to be well integrated

21 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [18]–[19] and [52].

22 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [4.2].

with the transport network. There is also pedestrian connectivity to Manor Park Rail Station, of benefit to employees.[23] Mr Georgeson considers there will be no unacceptable effects of development traffic on the adjacent local or strategic roads.[24]

(b) Topography: the Site is flat and offers the opportunity to provide large parcels of land for a range of different industrial activities. Mr Colegrave contrasts this with much of the other vacant industrial land in Hutt City, which is steep or otherwise constrained.[25] Many industrial activities, including waste management facilities, require flat land.[26]

(c) Availability: the landowner (Te Rūnanga o Toa Rangatira) and developer (TKL) have made the Site available for industrial development. The Hutt City Urban Growth Strategy 2012–2032 identified the Site's potential for light industrial activity, and the draft District Plan showed General Industrial zoning.[27]

5.11 Turning to the provisions, I have considered other reasonably practicable options for achieving the objectives (section 32(1)(b)(i)).

5.12 Retaining the General Rural Zone (the status quo) is not the most appropriate option because:

(a) it prevents further, needed business capacity being realised;[28]

(b) with reference to the evidence of Mr Allen, the Site has close to zero value for rural production;[29]

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23 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.8].

24 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.10].

25 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.17] and [5.38].

26 Statement of Evidence of Sarah Whiteman (Hearing Stream Eight) dated 27 October 2026 at [5.5(b)].

27 Section 42A Report at [110(e)].

28 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [6.2]; Section 42A Report at [105]–[109].

29 Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [5.1].

(c) the Site sits within an urban setting; it is not adjacent to any other rural parcels;[30]

(d) some rural activities would result in environmental risk to freshwater from nutrient loads;[31] and

(e) the Site does not have a rural character.[32]

5.13 Submitters have also proposed other alternatives for the Site including residential, light industrial, open space and mixed-use zoning. While some of these may not be "reasonably practicable", I still address each below.

Residential Zone

5.14 I consider the Site to be inappropriate for residential activities. It is constrained for residential use by the fault and amenity overlays associated with the rail line and State Highway 2. Mr Humpheson describes the Site as acoustically constrained, with road traffic noise of approximately 55 to 65 dB LAeq(24h) across the Site, and notes this would reduce acoustic amenity for residents seeking quiet enjoyment of outdoor living areas.[33] I note the flood hazard is largely removed by the earthworks undertaken. However, to the extent that there is residual risk, industrial activities are less sensitive to flood hazards than residential activities.

5.15 The fault overlay would also make it challenging to use approximately 44% of the Site for residential buildings,[34] which would be an inefficient use of a large, flat site.

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30 Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [4.4(f)]; Section 42A Report at [119] and [143].

31 Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [6.4].

32 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [11.4] and [15.4]; Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [4.4(e)].

33 Statement of Evidence of Darran Humpheson (Hearing Stream Eight) dated 27 October 2026 at [4.7] and [7.10]–[7.12].

34 This calculation is made using the Proposed Plan maps online. Following Hearing Stream Five, the location of the Fault Location Area is to be slightly modified in accordance with the joint witness statement, but the area is generally comparable: Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [8.2].

Light Industry

5.16 The same constraint applies, to a lesser extent, to light industry, which the reporting planner notes is intended for smaller industrial areas.[35] Mr Colegrave records that the merits of light industrial zoning depend on whether it retains opportunities for large-lot and yard-based uses,[36] which can make use of land within the fault overlay where buildings are constrained.[37]

Open Space Zone

5.17 I do not consider open space zoning of any part of the Site to be the most appropriate option. The Site is privately owned by Te Rūnanga o Toa Rangatira, having been reacquired as commercial redress under its Treaty settlement.[38] As far as I am aware, it has never been zoned for recreation, and there are no easements allowing public access. The reporting planner, referencing the submission of TKL, notes that it is unusual for private land to be zoned open space, and that doing so could give rise to the possibility of compensation.[39] The recreational values of the area are provided by the adjoining Te Awa Kairangi corridor and Hutt River Trail, which the Precinct provisions protect through landscape buffers and screening, and the consented works include new footpath connections.[40] In my opinion open space zoning would only be an option as part of a residential precinct, which for the reasons above I do not consider appropriate.

Mixed Use Zone

5.18 A Mixed Use Zone would enable residential activities, which for the reasons above are not appropriate on the Site. It would also enable commercial and retail activities that are better located in centres and would be likely to generate more traffic than industrial activities, using up the capacity of the upgraded road network. The reporting planner considers the Site would not represent the fringe of a commercial centre or have strong potential to develop into a

35 Section 42A Report at [166].

36 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [A3] and [5.49(a)].

37 Statement of Evidence of Sarah Whiteman (Hearing Stream Eight) dated 27 October 2026 at [5.5(c)].

38 Statement of Evidence of Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [47]–[49].

39 Section 42A Report at [161].

40 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [8.2]–[8.6]; Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.8] and [6.4].

centre.[41] I agree that mixed use zoning is not the most appropriate option for the Site.

Whether the provisions in the proposal are the most appropriate way to achieve the objectives

5.19 Section 32(1)(b) requires analysis of whether the provisions are the most appropriate way to achieve the objectives of the Proposed Plan, having regard to other reasonably practicable options for achieving the objectives and the efficiency and effectiveness of the provisions in achieving the objectives. My full evaluation of these matters is in **Attachment 2**.

5.20 However, in summary, I consider General Industrial zoning with the Precinct provisions in **Attachment 1** is the most appropriate way to achieve the objectives of the Proposed Plan, for the following reasons:

(a) the rezoning provides land for industrial activities (GIZ-O1 and GIZ-O2 (purpose and activities in the zone)). It adds well-located industrial capacity that contributes to the wellbeing of the community (UDSD-O1, UDSD-O2 and UDSD-O14 (well-functioning urban environment));

(b) the Precinct rules restricting residential activities, grocery stores, service stations and larger commercial activities support GIZ-O2(5) (activities in the zone) by keeping the Site available for industrial use;

(c) the Site provides large, flat sites suited to large-lot and yard-based activities that are otherwise scarce in Hutt City (GIZ-O3 (provision of industrial spaces));[42]

(d) GIZ-PREC1-R13 requires the transport, water supply and wastewater upgrades to be in place before activities operate so that development is integrated with existing and planned infrastructure (GIZ-O4 (planned character and integration with infrastructure) and INFSD-O1 to INFSD-O4 (infrastructure));

(e) the landscaping, setback, colour, signage and lighting standards (GIZ-PREC1-S1 to S3), the building size threshold (GIZ-PREC1-S4) and the conditions on resource recovery parks (GIZ-PREC1-R4)

41 Section 42A Report at [163]–[165].

42 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.17] and [5.38].

manage adverse effects within the Site and at its interface with the river corridor and Mary Huse Grove, consistent with the technical evidence on behalf of TKL and WM (GIZ-O6 (adverse effects)). The Precinct standards protect the natural character, ecological and amenity values of Dry Creek and Te Awa Kairangi (NESD-O1 to NESD-O3 (natural environment));

(f) the rezoning enables Te Rūnanga o Toa Rangatira to develop its settlement land in line with its values and aspirations (TWSD-O1 (Role of tangata whenua) and TWSD-O4 (Culture, traditions and social and economic aspirations));[43] and

(g) the Site is on the valley floor, in an urban setting rather than within the hills and coastal greenbelt described in UDSD-O8 (Rural and open space areas).

5.21 By contrast, retaining the General Rural Zone would not achieve the objectives of the Proposed Plan as a whole. My assessment of the General Rural Zone objectives is in **Attachment 2**. In summary, the General Rural Zone objectives seek a zone in which open space prevails, rural activities and low-density residential development are provided for, and built development retains open space for rural activities (GRUZ-O1 to GRUZ-O3). The Site has been substantially modified, has close to no rural productive value,[44] and is constrained for residential use. As a result, those objectives would not be achieved on the Site in any meaningful way. Retaining the rural zone would also fail to achieve the Strategic Direction objectives for urban development, infrastructure and tangata whenua discussed above.

5.22 The proposed Precinct policies (GIZ-PREC1-P1 and P2) and the rules and standards that implement them are also the most appropriate way to achieve GIZ-PREC1-O1. Policy P1, rule R1 and standards S1 to S4 implement clauses (1) and (2) of the objective (GIZ-PREC1-O1). Policy P1.5 and rule R13 implement clause (3) of the objective, supported by rules R5 to R12, which restrict activities that would generate high traffic volumes or compromise the industrial use of the Site. Policy P2 and rule R4 provide for resource recovery and waste management facilities in a way that manages their effects.

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43 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026.

44 Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [1.2], [5.1] and [8.1]–[8.5];

The Risk of Acting or Not Acting

5.23 Under section 32(4)(b), I consider there is sufficient information about the effects of the provisions to act. The technical evidence assesses the likely effects of industrial development on the Site, and provides sufficient information on the risk of not acting, by retaining a rural zone. The risk of not acting is that needed industrial capacity is not provided and the Site remains underused.

Benefits and costs

5.24 Section 32(2) requires an assessment of the benefits and costs of the environmental, economic, social and cultural effects anticipated from the provisions, including opportunities for economic growth and employment.[45] I have compared General Industrial zoning with the Precinct against retaining the General Rural Zone. Overall, the benefits of the rezoning outweigh its costs, and the provisions are efficient.

5.25 The main benefit is about 9.9 ha of additional industrial land in a district facing a shortfall of 33 to 37 ha over the next ten years, with the economic growth that brings, estimated at approximately $35 million per annum.[46] Industrial use of the Site could support about 235 workers.[47]

5.26 The economic cost is the loss of rural productive potential, which is close to zero in the Site's current state.[48] Even if the land were remediated, a 10 ha kiwifruit orchard might create two to three full-time jobs plus some seasonal work.[49] The proposed provisions will result in some additional costs. The Precinct standards, management plans and consent requirement for larger buildings add compliance costs for developers. These are modest and targeted at the effects identified by the technical experts on behalf of TKL and WM.

5.27 The main environmental and social cost is the change in the character of the Site from largely undeveloped land to industrial use, which some residents and

45 RMA, section 32(2)(a).

46 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [1.3], [5.27]–[5.29] and [5.58]–[5.61].

47 Statement of evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.54]–[5.55] and Table 3.

48 Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [5.1].

49 Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [5.1] and [5.1(d)(ii)].

users of Te Awa Kairangi corridor may perceive as a loss.[50] The technical evidence is that these effects can be managed through the Precinct provisions, the district-wide provisions of the Proposed Plan and the NRP.[51] The Precinct provisions reduce these environmental and social costs through setbacks, landscaping requirements, and a planted corridor along Dry Creek (also required by conditions of RM220258 and RM230018), recessive colours, and lighting and signage controls.

5.28 Environmental and social benefits include a likely lower risk to freshwater than the activities enabled by the General Rural Zone,[52] riparian and perimeter planting, and social benefits associated with increased opportunities for employment that is accessible.[53]

5.29 The primary cultural benefit is enabling Te Rūnanga o Toa Rangatira to develop land reacquired through its Treaty settlement in line with its values and aspirations.

5.30 The potential cultural costs relate to effects on Te Awa Kairangi, which is the subject of a statutory acknowledgement, and Dry Creek.[54] These are addressed by the Precinct provisions protecting their natural character, ecological and amenity values, together with the NRP.

District Plan Requirements

5.31 A district plan must give effect to any national policy statement, the New Zealand Coastal Policy Statement, the regional policy statement and the National Planning Standards.[55] When preparing a district plan, a territorial authority must take into account any relevant planning document recognised

50 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [11.4]–[11.6].

51 Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [1.4], [6.4] and [7.1]; Statement of Evidence of Deborah Ryan (Hearing Stream Eight) dated 27 October 2026 at [5.17] and [8.2]; Statement of Evidence of Darran Humpheson (Hearing Stream Eight) dated 27 October 2026 at [1.4], [5.11] and [6.7]; Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [8.4]; Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [16.4]–[16.5] and [17.2].

52 Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [1.4] and [5.18].

53 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.8].

54 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [14]–[17] and [20].

55 RMA, section 75(3).

by an iwi authority and lodged with the territorial authority.[56] It must also have regard to any proposed regional policy statement.[57]

5.32 The following sections discuss how the proposed zoning gives effect to relevant national policy statements, the Regional Policy Statement for the Wellington Region ("**RPS**") and the National Planning Standards, and has regard to Proposed Change 1 to the RPS ("**Change 1**"). The Council's section 32 evaluation reports for the Proposed Plan record that no iwi management plans have been lodged with Hutt City Council.[58]

National Policy Statements

National Policy Statement on Urban Development 2020

5.33 Hutt City is a tier 1 local authority under the NPS-UD. Policy 2 requires it to provide at least sufficient development capacity to meet expected demand for business land over the short, medium and long term. As Mr Colegrave explains, that capacity must be plan-enabled, infrastructure-ready and suitable for the demand it is expected to serve, including in terms of site size and location. Demand must be assessed by sector for both the region and the district.[59] Policy 1 also requires a well-functioning urban environment to have or enable a variety of sites that are suitable for different business sectors in terms of location and site size.

5.34 Mr Colegrave estimates a need for about 53 ha of additional industrial land in Hutt City over the ten years from 2026, against vacant industrial land of 16 to 20 ha, leaving a gap of about 33 to 37 ha.[60] He notes the Housing and Business Development Capacity Assessment describes land constraints in Hutt City as likely already binding and that much of the remaining vacant industrial land is steep or otherwise constrained. He further notes that the 2025 Industrial Land Study identified the wider Manor Park area as the only investigation area in Hutt City and the only recommended area in the central region.[61] As set out above, the Site could provide about 9.9 ha of usable industrial land, which

56 RMA, section 74(2A).

57 RMA, section 74(2)(a)(i).

58 Hutt City Council, Section 32 Evaluation Report, Sites and Areas of Significance to Māori – at [38]

59 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [4.3]–[4.4].

60 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [1.3], [5.27] and Table 2.

61 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.11], [5.17], [5.32] and [5.37].

would meet roughly a quarter to a third of the ten-year gap.[62] Its large, flat area, consolidated ownership and access to the State Highway network suit the large-lot and yard-based activities that are hardest to accommodate by intensifying existing industrial land.[63] In contrast, the General Rural Zone adds no plan-enabled industrial capacity.[64]

5.35 The reporting planner also recognises the identified shortfall of business land in the region, and considers that zoning the Site for industrial use would assist in meeting the requirements of the NPS-UD, including Policy 8.[65] I agree. In my opinion, General Industrial zoning of the Site, with the Precinct, gives effect to Policies 1 and 2 of the NPS-UD by adding suitable, well-located industrial capacity of a type that is otherwise limited in Hutt City. The Precinct provisions that manage traffic generation and require the road upgrades to be in place ensure that capacity is also infrastructure-ready, albeit the Site is not immediately infrastructure-ready.

National Policy Statement for Infrastructure 2025

5.36 The NPS-I came into force on 15 January 2026. Its definition of infrastructure includes "additional infrastructure", which expressly includes resource recovery or waste disposal facilities. The relevant policies include Policy 4, which requires the efficient and timely delivery of infrastructure to be enabled, and recognises that the infrastructure provider identifies its preferred location. Policy 9 enables new infrastructure in all environments. Policy 10 requires the interface between infrastructure and other activities to be managed, including through zoning, buffers and design standards.

5.37 The NPS-I is relevant to the proposed zoning in two respects. It is relevant to the supply of land where resource recovery infrastructure can realistically locate, and to how the provisions applying to the Site treat that infrastructure including managing the interface between such infrastructure and other activities.

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62 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.54]–[5.55].

63 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.1] and [5.38].

64 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [6.2].

65 Section 42A Report at [105]–[109] and [242].

5.38 Waste management facilities need to be close to the customers and waste streams they serve.[66] Ms Whiteman describes WM's search for a suitable site over approximately 20 years, and the cost and viability consequences of locating further from its customers.[67] Mr Colegrave identifies a shortfall of vacant industrial land in Hutt City, and notes that the regional Waste Management and Minimisation Plan 2023–2029 identifies a pressing need for extra recovery capacity.[68] In my opinion, ensuring a sufficient supply of suitably located industrial land is a practical means of enabling resource recovery infrastructure.

5.39 The Precinct provisions I suggest include a policy recognising the benefits of industrial activities as well resource recovery and waste management facilities on the Site (the latter is consistent with Policy 1 of the NPS-I), and a policy and matters of discretion for waste management facilities including resource recovery parks that manage effects at the interface with residential and recreational areas (consistent with Policies 10 and 11).

5.40 I note that WM's proposed resource recovery park is intended to rely on its resource consent, not the zoning, to establish and operate. Under my proposed Precinct provisions a waste management facility would be a restricted discretionary activity, compared with a discretionary activity under the General Rural Zone. Whatever the outcome of the consent application, the zone and Precinct provisions applying to the Site would give effect to the NPS-I. In my opinion the provisions I suggest would do that better than either the General Rural Zone or the General Industrial Zone without site-specific provisions.

National Policy Statement for Highly Productive Land 2022

5.41 The NPS-HPL sets out the objective and policies for the management of highly productive land under the RMA. Until regional councils publish maps that identify highly productive land in their region, land is considered highly productive if it is zoned Rural and is land use capability ("**LUC**") class 1, 2 or 3. LUC class 1, 2 or 3 is defined in the NPS-HPL as: *land identified as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource*

66 Statement of Evidence of Sarah Whiteman (Hearing Stream Eight) dated 27 October 2026 at [7.2].

67 Statement of Evidence of Sarah Whiteman (Hearing Stream Eight) dated 27 October 2026 at [5.1] and [7.2].

68 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.27] and [5.65].

Inventory, or by any more detailed mapping in place at the commencement date that uses the Land Use Capability classification.[69]

5.42 Mr Allen states that the land is not shown on the Landcare "Our Environment Maps" that show land use capability and that the Site has the notation "Town". I have also referred to the New Zealand Land Resource Inventory ("**NZLRI**") GIS that is publicly available. The Site is not identified to be LUC 1, 2 or 3 as mapped by the NZLRI. Therefore, I do not consider the land within the Site to meet the definition of highly productive land. Consequently, the NPS-HPL does not form part of the planning framework that applies to the rezoning of the Site. The same conclusion is reached by the reporting planner.[70]

National Planning Standards 2019

5.43 In my further statement to the Panel following Hearing Stream Six (dated 9 October 2026), I set out that direction 5 of the District-wide Matters Standard requires provisions relating to infrastructure to be located in the energy, infrastructure and transport chapters, unless they are specific to a special purpose zone.[71] This is relevant as WM seeks resource recovery and disposal facilities be defined as infrastructure. As set out in my statement of evidence for Hearing Stream 6,[72] I consider this is necessary to adequately give effect to the NPS-I. The National Planning Standards were written well in advance of the NPS-I defining "additional infrastructure" and therefore did not contemplate the best way for District Plans to structure provisions about additional infrastructure. Any conflict is between the two national instruments, rather than between the relief sought by WM to amend the definition of Infrastructure and the Planning Standards.

5.44 In my further statement I set out that the relief sought by WM was not precluded by the National Planning Standards.[73] I suggested three potential options to improve consistency with the National Planning Standards whilst giving effect to the NPS-I. Those options are summarised below but, in short, I considered

69 NPS-HPL, clauses 1.3 (definition of "LUC 1, 2, or 3 land") and 3.5(7).

70 Section 42A Report at [41].

71 Further Statement of Angela Goodwin on the National Planning Standards (Hearing Stream Six) dated 9 October 2026 at [2.3].

72 Statement of Evidence of Angela Goodwin (Hearing Stream Six) dated 7 September 2026 at [16]–[21] and [45]–[48].

73 Further Statement of Angela Goodwin on the National Planning Standards (Hearing Stream Six) dated 9 October 2026 at [1.4].

Option B carried the lowest risk, and that Option C would also effectively reconcile the conflict in respect of 30 Benmore Crescent:[74]

(a) Option A: bring the zone provisions for additional infrastructure into the infrastructure chapter;

(b) Option B: retain the current structure of the Plan, with a cross-reference in the rules section of the infrastructure chapter to the zone chapters; or

(c) Option C: provide for uses within the definition of additional infrastructure in a special zone.

5.45 In regard to the zoning of the Site, the reporting planner considers the recommended Precinct to be consistent with the National Planning Standards, but that a special zone as sought in the primary submission of Te Rūnanga o Toa Rangatira would be inconsistent.[75] I prefer the Precinct approach. However, I do not consider the National Planning Standards preclude a special zone, and in my opinion both options are available to the Panel.

5.46 The National Planning Standards provide for a special zone where the proposed land use activities or anticipated outcomes of the zone meet the following criteria:[76]

(a) are significant to the district, region or country;

(b) are impractical to be managed through another zone; and

(c) are impractical to be managed through a combination of spatial layers.

5.47 On the first criterion, and in my opinion, a resource recovery park and other industrial activities needing large areas on the Site (as an example of the type of activity the Site could accommodate) would, at the least, be significant to the district. During Hearing Stream Six, Mr Bezuidenhout explained how waste management services operate as an integrated network.[77] The regional Waste

74 Further Statement of Angela Goodwin on the National Planning Standards (Hearing Stream Six) dated 9 October 2026 at [1.5]–[1.7].

75 Section 42A Report at [111] and [155]–[158].

76 National Planning Standards 2019, 8. Zone Framework Standard, direction 3.

77 Statement of Evidence of Willem Bezuidenhout (Hearing Stream Six) dated 7 September 2026.

Management and Minimisation Plan 2023–2029 identifies a pressing need for additional recovery capacity.[78]

5.48 On the second and third criteria, as I set out in my statement on the National Planning Standards following Hearing Stream Six (9 October 2026), the Standards do not preclude additional infrastructure being provided for within zones, and a cross-reference from the infrastructure chapter to the zone provisions would reconcile them with the NPS-I (Option B). A Precinct is therefore workable. However, the Standards pre-date the NPS-I and did not contemplate additional infrastructure. Where the principal anticipated outcome for a site is a regionally significant infrastructure facility, a special zone (Option C) allows the objectives, policies and rules for that infrastructure to sit together in one place, without relying on cross-referencing or on refining an underlying zone. In my opinion the Panel could reasonably conclude that this is the more practical way to manage the anticipated outcomes for the Site, and that the criteria are met.

Regional Policy Statement

5.49 The Proposed Plan must give effect to the operative RPS and have regard to Proposed Change 1 to the RPS.[79] Decisions on Change 1 were notified in October 2024 and some provisions remain subject to appeal. Key RPS provisions relevant to the rezoning are:

(a) Objective 22 and Policy 55 (Change 1): these seek a compact, well-designed, climate-resilient and accessible regional form and require development outside existing urban zones to contribute to that regional form. The Site adjoins the existing urban area of Manor Park, is well connected to the State Highway network, and this is consistent with regional form;

(b) Policy 32: district plans are to identify and protect key industrial-based employment locations. The rezoning adds industrial land, and the precinct provisions protect that capacity;

(c) Policy UD.3 (Change 1): this provides for plan changes that make a significant contribution to meeting a need for development capacity.

78 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.65].

79 RMA, sections 74(2)(a)(i) and 75(3)(c).

Whilst not a plan change, the Site would meet roughly a quarter to a third of the ten-year industrial land gap;[80]

(d) Policy 56 (Change 1): this seeks to manage the effects of development on rural areas, including on productive capacity and through reverse sensitivity. The Site has close to no rural productive capacity and is isolated from other rural land;[81]

(e) Policies 57 and 58: these seek integration of land use with transport and infrastructure. The precinct provisions require the road upgrades to be in place and manage traffic generation;[82]

(f) Policies UD.4, UD.5 and CC.10 (Change 1): Policy UD.4 prioritises development within existing urban zones, then planned greenfield development, then unanticipated greenfield development that is well connected along transport corridors and adds significantly to development capacity. The Site adjoins the existing urban area and SH2, would add to industrial capacity, and would shorten trips for firms serving Wellington and the Hutt Valley;[83]

(g) Policy 1: district plans are to discourage new sensitive activities locating near activities that emit odour, smoke or dust, and the reverse. Ms Ryan considers air quality effects can be adequately managed by NRP rules;

(h) Objective TWT and Policies 42, FW.3 and IM.1 (Change 1): these set a long-term freshwater vision for Te Whanganui-a-Tara, require an integrated, ki uta ki tai approach, and address the effects of urban development on freshwater, including through stormwater management and hydraulic neutrality. These matters are managed through the NRP rules that will apply to any development on the site;[84]

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80 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.55].

81 Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [4.4(f)] and [5.1].

82 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.4], [5.9] and [6.3].

83 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.46]–[5.47], [5.55] and [5.60]; Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [4.2].

84 Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [1.5] and [6.3].

(i) Objectives 23 and 24 and Policies 48, 49 and UD.2: these require the principles of the Treaty of Waitangi and matters of significance to tangata whenua to be taken into account. Dr McClean's evidence is that the rezoning best supports this.[85]

5.50 In my opinion, General Industrial zoning of the Site with the Benmore Crescent Precinct gives effect to the RPS and has regard to Change 1.

6. RESPONSE TO SUBMISSIONS

6.1 The majority of submissions are concerned with the compatibility of industrial uses and waste management facilities with residential areas in Manor Park. I have discussed the effects of an industrial zone and suggested Precinct provisions that manage interface effects and compatibility. I note that the reporting planner highlights that most General Industrial zoned land in the district shares a boundary with residential zones.[86]

6.2 I address other submission points including a sought separation distance, character, other zoning options, traffic and other environmental effects below.

Separation distance

6.3 The submission of the Residents' Society seeks a 400 m to 500 m separation distance for waste management facilities. Ms Ryan agrees with the reporting planner that the requested 500 m separation is not justified, noting that the relevant guidance allows for site-specific assessment rather than fixed distances.[87] This is achieved by the restricted discretionary activity status proposed and matters of discretion including odour. Mr Humpheson considers fixed separation distances are not an appropriate substitute for effects-based noise and vibration controls.[88]

6.4 Consistent with my supplementary memorandum on separation distances dated 8 October 2026 (responding to the Panel's Minute Seven in Hearing Stream Two),[89] I consider that if waste is stored and handled indoors, odour is

85 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [19] and [56].

86 Section 42A Report at [114].

87 Statement of Evidence of Deborah Ryan (Hearing Stream Eight) dated 27 October 2026 at [7.4]–[7.6].

88 Statement of Evidence of Darran Humpheson (Hearing Stream Eight) dated 27 October 2026 at [6.3] and [7.6]–[7.7].

89 Supplementary Memorandum of Angela Goodwin on Separation Distances (Hearing Stream Two) dated 8 October 2026.

managed and hazardous waste is excluded, a separation distance is not necessary from a land use perspective.

Character

6.5 The Residents' Society and several points from individual submitters consider an industrial zone or special purpose industrial zone would be incompatible with the rural, natural and recreational values of the area.

6.6 Dr McClean describes the history of the Site. After early pastoral farming, the land was acquired by the Crown in 1950 for a public works camp and railway realignment, and was later used for gravel extraction and horticulture.[90] He considers the Site has been dominated by largely non-rural uses since 1953, and is effectively an island with significant historical modifications and land disturbance.[91] Since Te Rūnanga o Toa Rangatira acquired the land in 2020, it has been leased to Rosco Ice Cream Ltd / TKL to facilitate its development.[92] As noted in my assessment of open space zoning in section 5, it has never been zoned for recreation and there is no right of public access. Mr Gibson explains that removal of vegetation on the Site was not restricted under the operative General Rural zoning.[93] To the extent that changed the character of the Site, it was allowed by the planning framework.

6.7 The consented bulk earthworks undertaken by Rosco Ice Cream Ltd have largely been completed on the eastern side of the Site, between Dry Creek and the railway corridor, and those areas have a compacted metal surface. The earthworks on the western (SH2) side and the Dry Creek culvert upgrades are still to be completed.[94] The current appearance of the Site is shown in the October 2026 drone aerial image attached to Mr Gibson's evidence.[95]

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90 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [13]–[14].

91 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [15]–[16].

92 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [49]–[51].

93 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.7].

94 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.3] and [5.7]–[5.8].

95 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.10] and Attachment 1.

6.8 Ms McRae considers the Site is substantially modified, does not form part of a wider coherent rural landscape, and does not exhibit characteristics that warrant retention of General Rural zoning.[96]

6.9 Mr Gibson explains that one of the conditions of the earthworks consent is to plant the riparian margins of Dry Creek and as part of RM230018 planting will effectively be undertaken around the perimeter of the Site.[97] Ms McRae notes that Dry Creek and the river corridor retain natural character, ecological and amenity values, which are recognised in the proposed site-specific provisions.[98]

6.10 In the attached set of provisions for either the Precinct or a special zone there are requirements for planting (in the event this planting is not already in place). These exceed the general landscaping standards for the General Industrial Zone. Ms McRae considers these bespoke provisions will strengthen the framework for maintaining or enhancing character, including through a predominantly indigenous planted corridor at least 20 m wide along Dry Creek.[99] The suggested standards go beyond the control on building size suggested in the submission of TKL and accepted by the reporting planner.[100]

Rural Zone Appropriateness

6.11 I note a number of submissions consider the rural zone (being the status quo) to be appropriate. For the reasons set out in section 5 above, and consistent with the Section 42A Report,[101] I do not consider the rural zone to be the most appropriate zone.

Traffic

6.12 Several submissions set out concerns with traffic, including that the number of vehicle movements from the Site will create unsafe conditions and result in congestion. Some submitters raise concerns that access to Manor Park for emergency vehicles may be blocked.

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96 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [1.2], [11.4] and [15.4]–[15.5].

97 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.9] and [5.16].

98 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [15.5].

99 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [8.5] and [14.6]–[14.7].

100 Section 42A Report at [127(e)].

101 Section 42A Report at [119] and [143]–[146].

6.13 Mr Georgeson has explained the assessment and modelling he has undertaken. This modelling has informed the infrastructure upgrades that are proposed.[102] As I explain earlier in this statement, the provisions require these upgrades to be in place prior to any development on the Site. Should an activity proceed prior to the infrastructure upgrades, it would be assessed as a non-complying activity.

6.14 The Site is well situated in close proximity to State Highway 2. Unless there is a specific destination in Manor Park, traffic will travel directly to State Highway 2. The Site is therefore well integrated with the road network. Mr Georgeson considers that subject to the infrastructure upgrades proposed the proposed zoning is suitable and will not compromise conditions for safety nor have an unacceptable level of effect on the efficiency of the road network.[103] This includes the efficiency of access for emergency vehicles, noting that standard road rules will continue to apply.

Other environmental concerns

6.15 Several submitters raise concern with the potential effects an industrial zone could have on the natural environment. I agree with the comments in the Section 42A Report that these matters are regulated through the Regional Plan.[104] I note that the suggested Precinct provisions include standards for any waste management facility to handle waste indoors which allows any water coming into contact with waste to be captured.

7. RESPONSE TO SECTION 42A REPORT

7.1 The Section 42A Report considers the Site should be rezoned to General Industrial with a precinct. As set out above I agree that a General Industrial zone is most appropriate. I also consider as an alternative that a special zone would be appropriate. I have set out reasons why a special zone would be acceptable earlier in this statement, if the Panel should prefer that approach for the overall structure of the Plan.

7.2 The reporting planner recommends consent requirements for buildings over 1,000 m² and a 10 m setback as sought by TKL, and accepts in part provisions

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102 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.4], [5.9] and [6.9].

103 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [5.10] and [8.3]–[8.4].

104 Section 42A Report at [212].

for Dry Creek and stormwater, subject to further information.[105] The report rejects the remaining site-specific provisions sought by TKL for a range of reasons, including a lack of information or justification.[106] I have set out the reasons for the Precinct provisions suggested in Attachment 1 and consider the provisions would adequately manage an industrial zoning.

7.3 The reporting planner rejects a restricted discretionary status for transfer stations and resource recovery facilities, and considers they should remain discretionary as heavy industrial activities.[107] For the reasons set out above and in my statement of evidence presented during Hearing Stream Two, I consider restricted discretionary status is appropriate on this Site.

7.4 The Section 42A Report sets out that the NPS-I is not relevant to the Proposed Plan review, although it is directly relevant to WM's resource consent application.[108] In my opinion it is relevant to the zoning of 30 Benmore Crescent. I have set out how the NPS-I is relevant to this decision and how provisions relating to the zone can give effect to the NPS-I.

7.5 Finally, the Section 42A Report recommends accepting the relief of WM and TKL that the rail corridor be rezoned to General Industrial.[109] I agree with this recommendation.

8. CONCLUSION

8.1 For the reasons set out in this evidence, I consider that rezoning the Site to General Industrial Zone, with the Benmore Crescent Precinct and the provisions I suggest in **Attachment 1**, is the most appropriate option under section 32 of the RMA. It gives effect to the NPS-UD, the NPS-I and the RPS. It would add needed industrial capacity on the modified Site with little rural value, provide for resource recovery infrastructure as a restricted discretionary activity, and manage the effects at the interface with the residential area and Te Awa Kairangi corridor. If the Panel prefers a special zone, I consider that option is also available, with the provisions in **Attachment 1** restructured as a special zone.

Angela Joy Goodwin

28 October 2026

105 Section 42A Report at [127(e)]–[127(f)].

106 Section 42A Report at [127] and [216(b)].

107 Section 42A Report at [127(d)].

108 Section 42A Report at [40].

109 Section 42A Report at [170]–[172] and [249].

GIZ-PREC1 – Benmore Crescent Precinct

Attachment 1 to the Statement of Evidence of Angela Goodwin (Planning) – Hearing Stream 8

Suggested provisions, set out in the format required by the National Planning Standards. The precinct applies only to the General Industrial Zone, so it sits within the General Industrial Zone chapter (District Plan Structure Standard, direction 10), after the zone provisions, and is identified as "PREC1" (Format Standard, direction 25).

Introduction

The Benmore Crescent Precinct applies to 30 Benmore Crescent, Manor Park (Te Kārearea), as shown on the planning maps. The site is bounded by State Highway 2, the Wairarapa railway line and Te Awa Kairangi / Hutt River, and is crossed by Dry Creek. It has been substantially modified by earthworks and is well connected to the State Highway network.

The precinct provides industrial land for activities that need larger sites, including resource recovery and waste management facilities, while protecting the character and amenity values of Dry Creek and Te Awa Kairangi and managing effects at the interface with the adjoining recreational corridor and the residential area at Mary Huse Grove.

The objectives, policies, rules and standards of the General Industrial Zone apply within the precinct, except where a precinct provision states otherwise. The precinct provisions apply in addition to the zone provisions. Where a precinct rule and a General Industrial Zone rule both apply to an activity, the precinct rule prevails.

Objectives

GIZ-PREC1-O1	Benmore Crescent Precinct
The Benmore Crescent Precinct provides for industrial activities that need larger sites, including resource recovery and waste management facilities, in a way that: 1. upholds the values of Dry Creek and Te Awa Kairangi and their margins; 2. manages adverse effects at the interface with the Te Awa Kairangi recreational corridor and the residential area at Mary Huse Grove; and 3. is integrated with the transport network.	

All objectives of the General Industrial Zone apply in the Benmore Crescent Precinct.

Policies

GIZ-PREC1-P1	Managing effects of development
Manage activities within the Benmore Crescent Precinct by: 1. maintaining values of Dry Creek and Te Awa Kairangi and their margins; 2. maintaining and enhancing a predominantly vegetated corridor along Dry Creek; 3. integrating buildings, structures, outdoor storage, work areas, loading areas and lighting into the site through building siting, recessive colours and comprehensive landscape treatment; 4. managing effects at the interface with the recreational area adjoining Te Awa Kairangi and the residential area at Mary Huse Grove;	

5. managing the overall level of development to ensure the safe and efficient operation of the transport network; and
6. maintaining access required for river management, flood protection and recreational functions within the Te Awa Kairangi corridor.

GIZ-PREC1-P2	Industrial land and resource recovery
Recognise the importance of the Benmore Crescent Precinct in providing industrial land to the city, particularly for activities that need larger areas of land, and for resource recovery and waste management facilities, and the benefits of those activities to the district and region.	

GIZ-PREC1-P3	Heavy industrial activities
Avoid heavy industrial activities, with the exception of waste management facilities, unless they: 1. have an operational or functional need to operate at the specific site proposed; or 2. are managed to have no significant adverse effects different in scale or character to those from activities primarily provided for in the zone.	

GIZ-P3 does not apply in the Benmore Crescent Precinct.

Drafting note: *Those provisions highlighted are only proposed in the event waste management facility is not a defined term in the plan and/or waste management facilities remain part of the definition of heavy industrial activity.*

All policies of the General Industrial Zone apply unless otherwise stated.

Rules

Note: The rules of the General Industrial Zone and the district-wide chapters apply within the precinct in addition to the rules below.

Buildings and structures

GIZ-PREC1-R1	Construction of new buildings and structures and alterations and additions to existing buildings and structures
1. Activity status: Permitted Where: a. compliance is achieved with GIZ-S1 and GIZ-S2 and b. compliance is achieved with GIZ-PREC1-S1 to GIZ-PREC1-S5. **2. Activity status:** Restricted discretionary Where: a. compliance is not achieved with GIZ-S1 or GIZ-S2 or GIZ-PREC1-S4. **Matters of discretion are restricted to:** 1. the matters of discretion in GIZ-S1, GIZ-S2 and GIZ-PREC1-S4. **3. Activity status:** Discretionary Where: a. compliance is not achieved with GIZ-PREC1-S1, GIZ-PREC1-S2 or GIZ-PREC1-S3.	

Land use activities

GIZ-PREC1-R2	Industrial activities, other than heavy industrial activities and waste management facilities
1. Activity status: Permitted *GIZ-R4 does not apply in the Benmore Crescent Precinct.*	

GIZ-PREC1-R4	Waste management facilities including resource recovery parks
1. Activity status: Restricted discretionary Where: a. waste is handled and stored indoors; b. no active composting (excluding the transfer of green waste) is undertaken on the site; c. the activity operates in accordance with a fire management plan; d. the activity operates in accordance with a pest management plan; and e. the activity operates in accordance with a dust and odour management plan. **Matters of discretion are restricted to:** 1. the visibility and screening of outdoor storage and waste handling; 2. the adequacy, timing, establishment and long-term maintenance of landscape mitigation; 3. fire fighting and prevention measures; 4. measures to manage dust and odour; and 5. measures to manage pests and likely effects on the surrounding environment. **2. Activity status:** Discretionary Where: a. compliance is not achieved with GIZ-PREC1-R4.1.	

GIZ-PREC1-R5	Commercial activities not otherwise provided for
1. Activity status: Discretionary Where: a. the commercial activity has a gross floor area of no more than 500 m². **2. Activity status:** Non-complying Where: a. compliance is not achieved with GIZ-PREC1-R5.1. *GIZ-R16 does not apply in the Benmore Crescent Precinct.*	

GIZ-PREC1-R6	Food and beverage activities
1. Activity status: Permitted Where: a. the activity is ancillary to a resource recovery park or an industrial activity. **2. Activity status:** Non-complying Where: a. compliance is not achieved with GIZ-PREC1-R6.1. *GIZ-R11 does not apply in the Benmore Crescent Precinct.*	

GIZ-PREC1-R7	Grocery stores and supermarkets
1. Activity status: Non-complying *GIZ-R10 does not apply in the Benmore Crescent Precinct.*	

GIZ-PREC1-R8	Service stations, including ancillary retail activities
1. Activity status: Non-complying *GIZ-R12 does not apply in the Benmore Crescent Precinct.*	

GIZ-PREC1-R9	Residential activities
1. Activity status: Non-complying *GIZ-R19 does not apply in the Benmore Crescent Precinct.*	

GIZ-PREC1-R10	Heavy industrial activities, excluding waste management facilities
1. Activity status: Discretionary *GIZ-R18 does not apply in the Benmore Crescent Precinct.*	

Drafting note: *Those provisions highlighted are only proposed in the event waste management facility is not a defined term in the plan and/or waste management facilities remain part of the definition of heavy industrial activity.*

GIZ-PREC1-R11	Trade supply retail activities
1. Activity status: Non-complying *GIZ-R15 does not apply in the Benmore Crescent Precinct.*	

GIZ-PREC1-R12	Yard-based retail activities
1. Activity status: Non-complying *GIZ-R14 does not apply in the Benmore Crescent Precinct.*	

General rules

GIZ-PREC1-R13	Traffic generation and transport infrastructure

1. Activity status: Permitted

Where:

a. the following infrastructure upgrades have been constructed and are operational:

i. water supply and wastewater infrastructure; and

ii. the following transport network upgrade works, shown on Figure 1:

A. the right turn bay on Manor Park Road into Benmore Crescent;

B. the design changes to Manor Park Road and Benmore Crescent;

and

D. the changes to the Manor Park rail level crossing, including the pedestrian crossing; and

b. the total daily vehicle movements do not exceed 2,900 per day measured on a weekly average.

2. Activity status: Non-complying

Where:

a. compliance is not achieved with GIZ-PREC1-R13.1.

This rule does not apply to construction activities.

TRPT high trip generation rules and Table 8 do not apply to the Benmore Crescent Precinct.

Note: The purpose of this rule is to manage the effects of activities in the Benmore Crescent Precinct on the transport network.

Standards

GIZ-PREC1-S1	Landscaping

1. A landscape plan must be prepared by a suitably qualified landscape architect and submitted to and certified by the Council for the construction of any new building (excluding ancillary buildings).
2. The landscape plan must include:
   a. a continuous landscaped buffer along the site boundary adjoining the Te Awa Kairangi recreational corridor for the portion adjacent to the activity proposed;
   b. screen planting between principal buildings (within 50m of the site boundary with the Te Awa Kairangi recreational corridor) and the Hutt River Trail;
   c. screen planting along the eastern site boundary with the railway corridor to mitigate views from Mary Huse Grove for the portion adjacent to the activity proposed;
   d. a planted corridor at least 20 m in total width along Dry Creek, measured as 10 m horizontally from the centreline of the creek on each side, except where a greater width is required by a regional consent or another applicable standard;
   e. planting comprising predominantly indigenous species appropriate to the ecological conditions of Dry Creek and the Te Awa Kairangi corridor for the portion of Dry Creek adjacent to the activity proposed;
   f. tall canopy species capable of screening or visually integrating principal buildings;
   g. the location and width of river management access, pedestrian paths, fences, bunds, batters, stormwater devices and underground or overhead services; and
   h. establishment and maintenance measures, including plant protection, irrigation or watering, weed control and replacement planting.

3. If the planting as required by (2) is already in place on site, adjacent to the activity proposed, this standard does not apply.

GIZ-PREC1-S2	Building colour, signage and lighting
1. Exterior walls and roofs of principal buildings visible from the Te Awa Kairangi recreational corridor or Mary Huse Grove must use recessive colours in a range of browns, greens and greys with a light reflectance value not exceeding 30 per cent, except for minor architectural elements or where required by operational safety standards. 2. No illuminated sign, digital sign, third-party advertising sign or building-mounted sign exceeding 2 m² may be located on a building façade facing or visible from the Te Awa Kairangi recreational corridor or Mary Huse Grove. This does not apply to signs required for identification, health and safety, emergency management or statutory compliance. 3. Exterior lighting must be directed downward, shielded from the Hutt River Trail and residential properties, and designed to avoid unnecessary light spill into the Te Awa Kairangi corridor.	

GIZ-PREC1-S3	Building setbacks
1. Buildings, structures, outdoor storage, waste handling, parking and impermeable operational areas must be set back at least 10 m horizontally from the centreline of Dry Creek and from site boundaries. **Matters of discretion if the standard is breached:** 1. Access for repairs and maintenance to buildings and structures on the site. 2. Urban design outcomes 4, 5 and 6 in GIZ-P9: Urban design outcomes (by meeting standard or assessment), and the exclusions in GIZ-P11. 3. Any positive effects that can only be achieved through non-compliance with the standard.	

GIZ-PREC1-S4	Building size
1. The gross floor area of any building, other than a building associated with a resource recovery park, must not exceed 1,000 m². **Matters of discretion if the standard is breached:** 1. Landscape and visual effects. 2. Exterior colour and reflectivity.	

GIZ-PREC1-S5	Water supply
1. Every activity/ site must include provision for fire fighting water **Matters of discretion if the standard is breached:** 1. The sufficiency of fire fighting water supplies.	

GIZ-S3 and GIZ-S5 do not apply in the Benmore Crescent Precinct.

Figure 1 – Transport network upgrade works

[Figure to be inserted]

SECTION 32AA EVALUATION – REZONING OF 30 BENMORE CRESCENT

Attachment 2 to the Statement of Evidence of Angela Goodwin (Planning) – Hearing Stream Eight

1. INTRODUCTION

1.1 Waste Management NZ Ltd ("**WM**") seeks that 30 Benmore Crescent ("**Site**"), currently zoned General Rural in the Proposed District Plan ("**Proposed Plan**"), be zoned General Industrial with a Benmore Crescent Precinct ("**Precinct**") that includes site-specific provisions. Alternatively, the provisions could be structured as a special zone, if that is the Panel's preference. WM also seeks that the rail corridor adjacent to the Site be zoned General Industrial.

1.2 Hutt City Council's ("**Council**") reporting planner recommends the Site be zoned General Industrial with a Precinct. I agree with that approach. However, the provisions I suggest for the Precinct impose greater controls over future development than those recommended by the reporting planner. These additional provisions are:

(a) an objective for the Precinct (GIZ-PREC1-O1);

(b) a precinct policy to manage the effects of development (GIZ-PREC1-P1) and a precinct policy recognising the role of the Precinct in providing large industrial sites and sites for waste management facilities (GIZ-PREC1-P2);

(c) making waste management facilities, including resource recovery parks, a restricted discretionary activity where waste is handled and stored indoors, no active composting occurs, and the activity operates under fire, pest, and dust and odour management plans, with discretionary status if those conditions are not met (GIZ-PREC1-R4). Under the notified Proposed Plan and the reporting planner's recommendations these facilities would be discretionary as heavy industrial activities;[1]

(d) standards for landscaping, including a planted corridor at least 20 m wide along Dry Creek (GIZ-PREC1-S1) if this planting is not already in place, and for building colour, signage and lighting (GIZ-PREC1-S2);

(e) extending the 10 m setback recommended by the reporting planner so that it applies from the centreline of Dry Creek and to outdoor storage, parking and impermeable areas (GIZ-PREC1-S3);

(f) generally a more restrictive activity status than elsewhere in the General Industrial Zone for commercial activities, food and beverage activities that are not ancillary to

1 Section 42A Report at [127(d)] and [190].

industrial activities, grocery stores and supermarkets, service stations, residential activities, trade supply retail and yard-based retail (GIZ-PREC1-R5 to R9, R11 and R12);

(g) a traffic generation and transport infrastructure rule that requires the transport, water supply and wastewater upgrades to be in place before activities establish, and limits total traffic movements to 2,900 per day, measured on a weekly average (GIZ-PREC1-R13);

(h) if waste management facilities are not separately defined and excluded from heavy industrial activity (this is part of the relief WM seeks), a rule that makes heavy industrial activities other than waste management facilities discretionary and excludes them from Policy GIZ-P3 (GIZ-PREC1-P3 and GIZ-PREC1-R10); and

(i) a requirement for firefighting water supplies.

1.3 For completeness, this evaluation also covers the rezoning of the Site to General Industrial, the building size and setback controls, and the rezoning of the adjoining rail corridor to General Industrial. The reporting planner recommends each of these and I support them.[2]

1.4 The amendments sought are the most efficient and effective way to achieve the objectives of the Proposed Plan and the purpose of the RMA. The analysis supporting this conclusion is set out below. It draws on the expert evidence of Mr Gibson (planning), Mr Colegrave (economics), Mr Allen (rural productivity), Ms McRae (landscape, visual and natural character), Mr Humpheson (noise and vibration), Ms Ryan (air quality), Mr Farrant (water management) and Mr Georgeson (traffic), the corporate evidence of Mr Burrell for Te Kārearea Ltd ("**TKL**"), and the evidence of Dr McClean for Te Rūnanga o Toa Rangatira.

2. SECTION 32AA

2.1 Section 32AA of the RMA states:

> **32AA Requirements for undertaking and publishing further evaluations**
>
> (1) A further evaluation required under this Act—
>
> (a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the **changes**); and
>
> (b) must be undertaken in accordance with section 32(1) to (4); and
>
> (c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

[2] Section 42A Report at [127(e)], [170]–[179] and [248]–[249].

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the decision on the proposal is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

2.2 Section 32AA of the RMA refers to the requirements in section 32(1) to (4), which are as follows:

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

(a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and

(b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—

(i) identifying other reasonably practicable options for achieving the objectives; and

(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and

(iii) summarising the reasons for deciding on the provisions; and

(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

(2) An assessment under subsection (1)(b)(ii) must—

(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

(3) If the proposal (an amending proposal) will amend a regional policy statement, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

(a) the provisions and objectives of the amending proposal; and

(b) the objectives of the existing proposal to the extent that those objectives—

(i) are relevant to the objectives of the amending proposal; and

(ii) would remain if the amending proposal were to take effect.

(4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.

2.3 Section 32AA(1)(c) of the RMA states that the evaluation required under section 32 of the RMA "must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes". This section 32AA evaluation reflects the scale and significance of the proposed changes.

2.4 In relation to section 32(4) of the RMA, there are no national environmental standards that are relevant to the subject matter of this evaluation.

3. PURPOSE OF THE PROPOSAL AND OBJECTIVES

3.1 The purpose of the proposal is to rezone the Site from General Rural to General Industrial and apply the recommended Precinct (GIZ-PREC1), or an equivalent special zone, and to rezone the adjoining rail corridor General Industrial. The Precinct provides industrial land for activities that need larger sites, including resource recovery parks and waste management facilities. It also aims to maintain the values of Dry Creek and Te Awa Kairangi and to manage effects at the interface with Te Awa Kairangi recreational corridor and the residential area at Mary Huse Grove.

3.2 The proposal amends a plan that is already proposed. Under section 32(3), the examination therefore relates to the objectives of the amending proposal, and to the existing objectives of the Proposed Plan that are relevant to it and would remain if it took effect.

Objective of the proposal

3.3 The proposal introduces one new objective:

GIZ-PREC1-O1 Benmore Crescent Precinct

The Benmore Crescent Precinct provides for industrial activities that need larger sites, including waste management facilities, in a way that:

1. protects the natural character, ecological and amenity values of Dry Creek and Te Awa Kairangi and their margins;
2. manages adverse effects at the interface with the Te Awa Kairangi recreational corridor and the residential area at Mary Huse Grove; and

3. is integrated with the transport network.

3.4 All objectives of the General Industrial Zone continue to apply within the Precinct. In my opinion, GIZ-PREC1-O1 (and the General Industrial zone objectives) is the most appropriate way to achieve the purpose of the RMA (section 32(1)(a)) because it:

(a) enables people and communities to provide for their economic and social wellbeing (section 5). It does this by providing industrial land and employment;[3]

(b) enables Te Rūnanga o Toa Rangatira to develop land reacquired through its Treaty settlement in line with its aspirations, recognising the relationship of Ngāti Toa Rangatira with Te Awa Kairangi (sections 6(e), and 8);[4]

(c) does not alter the management of natural hazards on the Site, which is addressed through the Natural Hazards chapter (section 6(h));

(d) maintains amenity values at the interface with Mary Huse Grove and Te Awa Kairangi recreational corridor (section 7(c));[5]

(e) provides for the efficient use of a modified site with consented access and servicing (section 7(b)); and[6]

(f) seeks to preserve the natural character of Dry Creek and Te Awa Kairangi and their margins, and to protect them from inappropriate use and development (section 6(a)), and has regard to the quality of the environment (section 7(f)).

Relevant objectives of the Proposed Plan

3.5 In my view, the most relevant existing objectives are the Strategic Direction objectives and the General Industrial Zone objectives. Table 1 below summarises what these objectives seek and my assessment of the proposal against them.

Table 1: Summary of relevant Proposed Plan objectives

Objectives	What they seek	Summary of my assessment
Climate change and natural hazards (CCSD-O1, CCSD-O2)	Urban form supports the city becoming carbon neutral by 2050. The risk from natural hazards and climate change is avoided or minimised to acceptable levels.	The Site is close to State Highway 2 ("**SH2**") and Manor Park Station, which shortens trips for firms serving Wellington and the Hutt Valley.[7] The earthworks raise the Site platform above the flood level, leaving flooding limited to the Dry Creek

3 Statement of evidence of Fraser Colegrave at [1.3], [1.7], [5.30], [5.57] and [5.59]–[5.60].

4 Statement of evidence of Dr Robert McClean at [17]–[19], [52] and [56].

5 Statement of evidence of Emma McRae at [12.2]; Statement of evidence of Darran Humpheson at [8.1].

6 Statement of evidence of Fraser Colegrave at [5.54] and [5.63]; Statement of evidence of David Gibson at [5.1]–[5.16].

7 Statement of evidence of Fraser Colegrave at [5.41], [5.49]–[5.50] and [5.61].

Objectives	What they seek	Summary of my assessment
		corridor.[8] Any yards and parking can be located in the Fault Location Area, where buildings are non-complying.[9]
Infrastructure (INFSD-O1 to INFSD-O6)	Land use is integrated and co-ordinated with infrastructure and its funding. Infrastructure of national and regional significance is supported and protected. The transport network is safe, efficient and multi-modal, and accessible by a range of modes. New development uses water sensitive design.	Roading, water and wastewater are consented under RM230018 and will be funded by the developer.[10] The approved road upgrades support up to 2,900 vehicle movements per day.[11] Industrial uses are not sensitive to SH2 and the railway, avoiding potential reverse sensitivity effects.[12] Waste management facilities including resource recovery parks are additional infrastructure under the NPS-I.[13] New footpaths and a rail crossing connect the Site to Manor Park station and the Hutt River Trail.[14] Stormwater will be managed in accordance with the Water Sensitive Design Guidelines.[15]
Natural environment (NESD-O1 to NESD-O3)	The health and wellbeing of Te Awa Kairangi is restored and protected. The values of significant water bodies are protected. Natural character, landscapes, ecosystems and indigenous biodiversity are protected and enhanced.	Stormwater will be treated before discharge, and the Natural Resources Plan and consent requirements protect freshwater values. Industrial use may present a lower risk to freshwater than rural use.[16] The Precinct secures a planted corridor at least 20 m wide along Dry Creek and buffering to Te Awa Kairangi. The Site is not within an outstanding natural feature or landscape or a special amenity landscape.[17]
Tangata whenua (TWSD-O1, TWSD-O2, TWSD-O4)	The role of tangata whenua as kaitiaki is acknowledged and provided for. Tangata whenua actively participate in implementing the Proposed Plan. Tangata whenua can protect, develop and use whenua consistent with their culture and their social and economic aspirations.	The Site was reacquired by Te Rūnanga o Toa Rangatira as commercial redress under its Treaty settlement.[18] Te Rūnanga seeks industrial zoning.[19] Dr McClean considers an industrial zone better provides for the development aspirations and mana motuhake of Te Rūnanga o Toa Rangatira.[20]
Urban development	A well-functioning urban environment that is safe, connected, serviced, ecologically sensitive, close to	Rezoning provides industrial capacity and employment, and its economic benefits outweigh its costs.[21] The Site is not

8 Statement of evidence of David Gibson at [8.7]–[8.10].
9 Statement of evidence of David Gibson at [8.4]–[8.6].
10 Statement of evidence of David Gibson at [1.7], [5.10]–[5.17], [7.4]–[7.9] and [7.19].
11 Statement of evidence of Mark Georgeson at [5.9]–[5.10] and [6.3].
12 Statement of evidence of Darran Humpheson at [7.16]-[7.17] and [8.2].
13 Statement of evidence of Fraser Colegrave at [5.65].
14 Statement of evidence of Mark Georgeson at [5.8] and [6.4].
15 Statement of evidence of Stuart Farrant at [1.3] and [5.9]–[5.12].
16 Statement of evidence of Stuart Farrant at [1.4]–[1.5], [5.12], [5.16], [5.18]–[5.19] and [6.2]-[6.4].
17 Statement of evidence of Emma McRae at [1.2], [5.3] and [9.5].
18 Statement of evidence of Dr Robert McClean at [47]–[49].
19 Statement of evidence of Dr Robert McClean at [50]–[51].
20 Statement of evidence of Dr Robert McClean at [19], [52] and [56].
21 Statement of evidence of Fraser Colegrave at [1.8], [5.57], [5.74] and [8.3].

Objectives	What they seek	Summary of my assessment
(UDSD-O1 to UDSD-O4, UDSD-O8, UDSD-O11, UDSD-O14)	employment, resilient and adaptable. A consolidated urban form, with greenfield development only in identified areas, using land and infrastructure efficiently. The rural greenbelt is retained, special values are reflected, and industrial and business activities contribute to community wellbeing.	identified for development in the Proposed Plan. However, it is surrounded by urban uses and infrastructure, has been used for non-rural purposes since approximately the 1950s, and is within the only Hutt City investigation area in the 2025 Industrial Land Study.[22] It does not form part of the greenbelt and is separated from other rural land.[23] Controls on building colour, reflectivity, signage and lighting respond to the adjoining special amenity landscape.[24]
General Industrial Zone (GIZ-O1 to GIZ-O6)	The zone is used primarily for industrial activities, separated from sensitive activities. It provides for a range of compatible activities and a variety of tenancy types and sizes. Its character is healthy, safe, attractive, accessible and integrated with infrastructure. Main through routes are attractive, and adverse effects are managed within the zone and at its interfaces.	The large, flat Site with consolidated ownership and SH2 access suits industrial activities that need yards and vehicle circulation.[25] It is separated from Mary Huse Grove by the rail corridor.[26]

3.6 The notified proposal is that the zone be General Rural. Retaining the General Rural Zone would not achieve the objectives of the Proposed Plan, in particular those for the General Rural Zone, for the following reasons:

(a) GRUZ-O1 and GRUZ-O3: the Site has been substantially modified by consented bulk earthworks, and approximately 70–80% of it is covered by a gravel pad or roading. Mr Allen considers it has close to no value for rural production, and that productive rural use is unlikely to be viable even if the Site were remediated. Its open space would not in practice provide opportunities for rural activities;[27] and

(b) GRUZ-O4: interface effects with Mary Huse Grove and Te Awa Kairangi corridor can be managed under either zone. However, the Precinct provisions address those interfaces specifically, through landscaping, setbacks, building colour and lighting controls.[28]

22 Statement of evidence of Emma McRae at [5.2] and [6.1]-[6.4]; Statement of evidence of Dr Robert McClean at [16]; Statement of evidence of Fraser Colegrave at [1.4] and [5.40].

23 Statement of evidence of Emma McRae at [5.2] and [11.31]; Statement of evidence of James Allen at [4.5(f)].

24 Statement of evidence of Emma McRae at [5.3] and [9.7].

25 Statement of evidence of Fraser Colegrave at [5.1] and [5.41].

26 Statement of evidence of Darran Humpheson at [4.3].

27 Statement of evidence of James Allen at [1.2], [4.5(b)], [5.1], [5.24] and [7.1]–[7.2]; Statement of evidence of David Gibson at [5.5]–[5.6].

28 Statement of evidence of Emma McRae at [9.2]–[9.7] and [12.2].

4. REASONABLY PRACTICABLE ALTERNATIVES

Notified General Rural Zone

4.1 The first reasonably practicable alternative would be retaining the notified zoning – General Rural. I note that Council undertook a section 32 analysis of the General Rural Zone. However, in my opinion it does not contain a full analysis of the costs and benefits of a rural zone, nor does it demonstrate how it is the most appropriate way to achieve the objectives of the Proposed Plan. One of the reasons provided for the notified zone is the level of community interest.[29] In my view, community opposition or interest is not an adequate way to assess the social benefits or costs of a proposal. Nor does it necessarily reflect the views of the community as a whole or whether it is the best alternative. One of the purposes of the plan-making process is to test this through public notification.

4.2 A General Rural Zone would not effectively achieve the objectives and policies of the rural zone. Nor would it be efficient, because its costs outweigh its benefits. In summary:

(a) The Site has almost zero value for rural productivity and, in its current state, is incapable of supporting agricultural or horticultural production.[30]

(b) Even if remediated (all gravel and fill removed, which is considered fanciful) productive rural uses are unlikely to be viable. This is because of the small scale of the Site, its isolation from other rural land and support infrastructure, uncertain water availability, the proximity of residential neighbours and the cost of removing the gravel.[31]

(c) Rural uses have high potential to have adverse effects on freshwater, as stock grazing or fertilised cropping on the free-draining gravels may leach nutrients to shallow groundwater connected to Dry Creek and Te Awa Kairangi.[32] Mr Farrant considers the General Rural zone also presents risk to the receiving water environment.[33]

(d) The Site does not have a rural character, nor does it form part of the greenbelt.[34] It is modified, physically separated from other rural land, and sits within a mixed-use valley-floor environment shaped by SH2, the railway, and urban development.[35]

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29 Section 32 Evaluation of Rural Zones at [99].

30 Statement of evidence of James Allen at [1.2], [5.1] and [7.1].

31 Statement of evidence of James Allen at [1.3]–[1.4], [5.1(c)], [5.10]-[5.24] and [7.2].

32 Statement of evidence of James Allen at [5.20].

33 Statement of evidence of Stuart Farrant at [1.4], [5.18]–[5.19] and [6.4].

34 See my assessment of UDSD-O8 in Table 3 below.

35 Statement of evidence of Emma McRae at [1.2], [5.2], [11.7] and [12.1]; Statement of evidence of James Allen at [4.5(e)]–[4.5(f)] and [5.18].

(e) Rural use does not efficiently utilise the Site to meet the needs of the community. It provides significantly less employment.

Residential or Mixed-Use Zone

4.3 A residential zone or mixed-use zone that incorporates residential uses is also inefficient in my opinion. This is principally because residential uses are sensitive to the effects of SH2 and the rail line. The Site and noise contours over the Site from those transport corridors therefore offer less amenity for residential uses, particularly for outdoor living. Mr Humpheson predicts road-traffic noise of about 55 to 65 dB LAeq(24h) across the Site, with additional rail noise. He considers residential development would be acoustically constrained, particularly for outdoor amenity, and would introduce reverse sensitivity effects on SH2 and the rail corridor.[36] Residential uses would not make efficient use of the Site because of the earthquake fault, which is not suitable for buildings for sensitive activities. This would leave approximately 44% of the Site[37] unable to be used with acceptable risk under the Proposed Plan framework. Residential activities are also more susceptible to flooding to the extent that there is any residual flooding risk on the Site.[38] Mr Colegrave notes that no site-specific housing need has been demonstrated that would outweigh these constraints.[39]

Light Industrial

4.4 Light industrial is another alternative. However, I do not consider it is likely to be as efficient as General Industrial. Light industrial uses tend to require more buildings and smaller sites. Because of the earthquake fault, buildings are not the best outcome in that part of the Site. Under a General Industrial zone, ancillary yard and parking areas can locate within the Fault Location Area, using the Site efficiently.[40] Buildings for sensitive activities would also be a non-complying activity in the fault area. The opportunity to provide zoned land for industrial activities that require larger sites would also be partially lost. Mr Colegrave considers Light Industrial could also accommodate industrial uses, but that its economic merits depend on whether its rules allow a comparable scale of large-lot and yard-based activity.[41]

5. EVALUATION OF THE SPECIFIC PROVISIONS

5.1 The reporting planner recommends General Industrial zoning with a Precinct that includes a building size threshold and a 10 m setback. This section evaluates the additional or different provisions I suggest against that recommendation.

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36 Statement of evidence of Darran Humpheson at [1.5], [4.7] and [7.12]–[7.17].

37 This calculation is made using the Proposed Plan maps online. Following Hearing Stream 5, the location of the Fault Location Area is to be slightly modified in accordance with the Joint Witness Statement, but the area is generally comparable: Statement of evidence of David Gibson at [8.2].

38 Statement of evidence of David Gibson at [8.7]–[8.10].

39 Statement of evidence of Fraser Colegrave at [5.52(b)], [7.2] and [A5].

40 Statement of evidence of David Gibson at [8.4]–[8.6].

41 Statement of evidence of Fraser Colegrave at [5.52(a)] and [A3]-[A4].

Waste management facilities (GIZ-PREC1-R4 and GIZ-PREC1-P2)

5.2 The reasonably practicable options are: (i) discretionary activity status as a heavy industrial activity, as notified and as recommended by the reporting planner;[42] (ii) restricted discretionary activity status where specified conditions are met, with discretionary status otherwise, as I suggest; and (iii) non-complying status or a separation distance from residential zones, as sought by the Manor Park and Haywards Residents Community Incorporated Society.

5.3 In my opinion option (ii) is the most effective. The conditions require waste to be handled and stored indoors, exclude active composting, and require fire, pest, and dust and odour management plans. These address the potential effects requiring management. The matters of discretion then focus the assessment on the effects the experts have identified: landscape mitigation, fire, dust and odour. Ms Ryan considers the provisions appropriate to manage odour risk from a waste management facility on the Site and to allow effects to be assessed, and Ms McRae recommends the landscape and visual matters of discretion.[43] Noise, traffic and stormwater continue to be managed by the district-wide provisions, GIZ-PREC1-R13 and the NRP.

5.4 Option (ii) is also the most efficient. It reduces the cost and time of consenting by focusing the assessment on the relevant effects. The effects of a resource recovery park on this Site are well understood. Option (i) would leave these facilities subject to Policy GIZ-P3, which seeks to avoid heavy industrial activities unless they have an operational or functional need to locate in the zone. In my opinion that would not meaningfully provide for resource recovery infrastructure, and would not give effect to Policies 1, 4 and 9 of the NPS-I or recognise the regional significance of the activity.[44] Option (iii) is not supported by the technical evidence. Ms Ryan does not consider a 500 m separation distance justified, and Mr Humpheson considers fixed separation distances are not an appropriate substitute for effects-based controls.[45] If waste management facilities remain within the definition of heavy industrial activity, GIZ-PREC1-P3 and GIZ-PREC1-R10 achieve the same outcome while keeping other heavy industrial activities discretionary.

Landscaping, building colour, signage and lighting (GIZ-PREC1-S1 and S2)

5.5 These standards implement Ms McRae's recommendations.[46] They also provide the detail on protection and enhancement of the Dry Creek corridor that the reporting planner sought before accepting that part of TKL's submission.[47] The costs are design constraints on building colour and signage, and the cost of planting. Much of the planting is already required by RM220258

[42] Section 42A Report at [127(d)] and [190].
[43] Statement of evidence of Deborah Ryan at [5.16]; Statement of evidence of Emma McRae at [9.3] and [9.7].
[44] Statement of evidence of Sarah Whiteman at [1.3] and [4.7]-[4.8]; Statement of evidence of Fraser Colegrave at [5.65]–[5.67].
[45] Statement of evidence of Deborah Ryan at [7.4]–[7.6]; Statement of evidence of Darran Humpheson at [6.3] and [7.8]–[7.9].
[46] Statement of evidence of Emma McRae at [9.4]-[9.7].
[47] Section 42A Report at [127(f)] and [248].

and RM230018.[48] The colour and signage controls apply only to buildings visible from the Te Awa Kairangi corridor or Mary Huse Grove, so they are targeted at the effects of concern. A breach is a discretionary activity under GIZ-PREC1-R1. In my opinion these standards are the most efficient and effective way to achieve clauses 1 and 2 of GIZ-PREC1-O1, GIZ-O5 and GIZ-O6, and NESD-O3 and UDSD-O11.

Building setbacks and building size (GIZ-PREC1-S3 and S4)

5.6 The reporting planner recommends a 10 m setback from site boundaries and a 1,000 m² building size threshold.[49] I support both. I suggest the setback also apply from the centreline of Dry Creek and to outdoor storage, waste handling, parking and impermeable operational areas. The additional cost is a modest reduction in the usable area of the Site.

Activity restrictions (GIZ-PREC1-R5 to R9, R11 and R12)

5.7 The reporting planner rejected TKL's requested restrictions on retail, service station and food and beverage activities because no reasons were given.[50] The reason for these provisions is primarily to manage traffic effects. The road network has been upgraded for up to 2,900 vehicle movements a day. High trip generating activities such as supermarkets, service stations and drive-through food outlets would consume that capacity and reduce the land available for industrial activities.[51] The restrictions also partially retain large, flat sites for the industrial activities that need them, consistent with GIZ-O2(5), GIZ-O3 and RPS Policy 32.[52] The cost is forgone commercial opportunity on the Site.

Traffic generation and transport infrastructure (GIZ-PREC1-R13)

5.8 The alternative is to rely on the high trip generating activity thresholds in the Transport chapter. Mr Georgeson considers a site-specific rule is justified because the traffic effects of up to 2,900 vehicle movements a day have already been assessed through RM230018 and this is discussed in detail by Mr Gibson. He considers that relying on the Transport chapter thresholds would lead to unnecessary duplication in assessing consent applications.[53] The rule ties development to completion of the transport, water supply and wastewater upgrades. This is efficient because it avoids repeated assessments, and effective because it ensures development is integrated with infrastructure, achieving INFSD-O1, INFSD-O2 and clause 3 of GIZ-PREC1-O1, and giving effect to RPS Policies 57 and 58. Its cost is that activities established before the upgrades are complete would be non-complying, which reflects the basis on which RM230018 was granted.

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[48] Statement of evidence of David Gibson at [5.7]-[5.8] and [5.16].
[49] Section 42A Report at [127(e)] and [129].
[50] Section 42A Report at [127(b)]–[127(c)].
[51] Statement of evidence of Mark Georgeson at [5.9]–[5.10] and [6.3].
[52] Statement of evidence of Fraser Colegrave at [5.13], [5.24] and [5.41].
[53] Statement of evidence of Mark Georgeson at [6.9]–[6.10] and [7.3]–[7.4]; Statement of evidence of David Gibson at [6.2]–[6.5].

Rail corridor (rezoning from Medium Density Residential to General Industrial)

5.9 The options are to retain the notified Medium Density Residential zoning of the rail designation adjoining the Site, or to rezone it General Industrial. The reporting planner notes that if the notified zoning were retained, GIZ-S2 would apply the residential height in relation to boundary standard (MRZ-S4) along the Site boundary, even though the rail corridor separating the Site from Mary Huse Grove cannot be built on. Rezoning the corridor would recognise that separation, consistent with the approach taken at Taita.[54] The railway is unaffected because it operates under its designation.[55] Mr Humpheson considers the rail corridor is not a noise-sensitive receiving environment.[56] Mr Gibson agrees with the reporting planner.[57] In my opinion the rezoning is efficient because it avoids an unnecessary constraint on the use of the Site, and effective because it applies zone interface standards where they are intended to apply, achieving GIZ-O4 and GIZ-O6. It has no material costs.

6. S32AA ANALYSIS

Evaluation of Proposed Provision	
Proposed Amendment	
To zone the Site General Industrial with the Precinct overlay, or a special zone with the same provisions. To zone the rail corridor adjacent to the Site General Industrial, as recommended in the Section 42A Report, rather than Medium Density Residential as notified in the Proposed Plan. The proposed Precinct provisions provided in **Attachment 1**, including to make waste management facilities (including resource recovery parks) a restricted discretionary activity, rather than discretionary as they would be under both the notified rules and those recommended by the reporting planner.	
Benefits	**Costs**
Environmental Increased planting: a riparian corridor at least 20 m wide along Dry Creek and planting around the perimeter of the Site, required by RM230018, together with a landscape plan required by proposed GIZ-PREC1-S1. The landscape plan would provide continuous buffering to the Te Awa Kairangi corridor and screening from the Hutt River Trail and Mary Huse Grove.[58] Lower risk to freshwater than rural land uses.[59] Stormwater from industrial development must be treated and managed in accordance with the	**Environmental** Change in the character of the Site from open land to industrial development, which some residents and users of the Te Awa Kairangi corridor will perceive as a cost. This is managed through the Precinct provisions on landscaping, setbacks, building appearance and lighting.[62] Evening and night-time noise limits for noise received at the residential properties on Mary Huse Grove are 5 dB higher than for the General Rural zone (daytime limits are unchanged). The

54 Section 42A Report at [172]–[177] and [249].

55 Section 42A Report at [173].

56 Statement of evidence of Darran Humpheson at [6.6].

57 Statement of evidence of David Gibson at [10.3]-[10.5].

58 Statement of evidence of David Gibson at [5.7]-[5.8] and [5.16]; Statement of evidence of Emma McRae at [5.5] and [9.5].

59 Statement of evidence of James Allen at [5.20]; Statement of evidence of Stuart Farrant at [1.4] and [5.17]–[5.19] and [7.3].

62 Statement of evidence of Emma McRae at [1.3] and [12.1]–[12.2].

Evaluation of Proposed Provision	
Water Sensitive Design Guidelines and the Natural Resources Plan.[60] Efficient use of a site that has already been modified by consented bulk earthworks and has close to zero rural productive value.[61]	receiving-site limits in the Noise chapter continue to protect residential amenity.[63] Potential odour and dust discharges from industrial activities, which are managed through the consenting framework under the Proposed Plan and the Natural Resources Plan.[64] Increased impervious surfaces and stormwater runoff, which are managed through stormwater treatment and hydrological controls.[65] Increased traffic (up to about 2,900 vehicle movements per day). This is managed by the consented road and rail crossing upgrades and the proposed traffic generation rule.[66]
Economic Improved opportunities for business development. Firms can establish, expand or remain locally, and serve Wellington and Hutt Valley customers at lower cost than from more distant sites.[67] Mr Burrell records current tenant interest in the Wellington market.[68] Opportunities to expand business land in Hutt City. The Site could provide about 9.9 ha of usable industrial land, roughly a quarter to a third of the indicative ten-year gap in vacant industrial land.[69] Increased employment opportunities, both during construction and ongoing (illustratively about 235 workers based at the Site).[70] A site for a resource recovery park as a restricted discretionary activity, addressing a gap in regional resource recovery capacity identified in the Wellington Region Waste Management and Minimisation Plan.[71] Access, water and wastewater infrastructure for the Site is consented and funded by the developer, reducing costs to Council and the community.[72] Rezoning the rail corridor avoids the residential height in relation to boundary	**Economic** Additional consenting costs as a result of the requirement to meet more requirements. More consents are likely to be required. Requirements for planting if not already implemented. Forgone rural production, which is very low given the condition of the Site.[74] Remaining development and infrastructure costs, which are funded by the developer.[75] There are no material costs from rezoning the rail corridor, as the railway operates under its designation.[76]

60 Statement of evidence of Stuart Farrant at [1.3], [5.9]–[5.12] and [5.16].

61 Statement of evidence of David Gibson at [5.5]-[5.6]; Statement of evidence of James Allen at [5.1].

63 Statement of evidence of Darran Humpheson at [1.3]–[1.4], [5.11] and [8.1].

64 Statement of evidence of Deborah Ryan at [5.14]–[5.15] and [8.2].

65 Statement of evidence of Stuart Farrant at [5.3], [5.10]–[5.11] and [7.2].

66 Statement of evidence of Mark Georgeson at [5.2]–[5.5], [5.9]–[5.10] and [6.10]; Statement of evidence of David Gibson at [6.3]–[6.5].

67 Statement of evidence of Fraser Colegrave at [5.59]–[5.61].

68 Statement of evidence of Richard Burrell at [5.6].

69 Statement of evidence of Fraser Colegrave at [1.3], [5.30] and [5.56]–[5.57].

70 Statement of evidence of Fraser Colegrave at [5.57], [5.60] and Table 3.

71 Statement of evidence of Fraser Colegrave at [5.64]–[5.68].

72 Statement of evidence of David Gibson at [1.7], [5.1], [7.4]–[7.9] and [7.19]; Statement of evidence of Fraser Colegrave at [5.54].

74 Statement of evidence of James Allen at [5.1]; Statement of evidence of Fraser Colegrave at [5.71].

75 Statement of evidence of Fraser Colegrave at [5.54] and [5.71]; Statement of evidence of David Gibson at [1.7] and [7.19].

76 Section 42A Report at [173].

Evaluation of Proposed Provision	
standard reducing the usable building envelope along the Site boundary.[73]	
Social Increased connectivity is enabled through extending the Manor Park Road footpath to Benmore Crescent, a new formalised pedestrian crossing of the rail line, and worker access to Manor Park station.[77] Employment opportunities close to existing residential areas and the Hutt Valley workforce.[78]	**Social** Some residents may perceive the change in character from open land to industrial use, and the potential for noise, odour and traffic, as a social cost. The expert evidence is that these effects can be appropriately managed through the Precinct provisions and the district-wide rules.[79] Mr Georgeson considers there will be no significant new delays or access restrictions for emergency services.[80]
Cultural The rezoning is in line with the aspirations of Ngāti Toa Rangatira. Dr McClean considers an industrial zone with tailor-made provisions is compatible with the developmental rights (mana motuhake) of Ngāti Toa Rangatira under Te Tiriti o Waitangi, and with the principles of kaitiakitanga and manaakitanga. The land was reacquired through the Treaty settlement.[81] He also considers a resource recovery facility aligns with the principles of Te Ao Tūroa.[82]	**Cultural** Potential effects on the mauri of Te Awa Kairangi; however, these are mitigated appropriately by Regional Plan provisions, and by the Precinct provisions protecting the natural character, ecological and amenity values of Dry Creek and Te Awa Kairangi.[83]
Efficiency	
It is considered that the rezoning and associated Precinct provisions will meet the objectives efficiently, given the benefits outweigh the costs as identified above. The amendments improve efficiency by making the Proposed Plan better able to give effect to higher order documents, including the NPS-UD and NPS-I. Mr Colegrave considers the economic benefits of the rezoning outweigh its costs.[84] The Site can be infrastructure-ready in the medium term, as the NPS-UD requires, because the infrastructure is consented and funded by the developer.[85] The NPS-HPL is not at issue as the Site does not contain highly productive land.[86] Restricted discretionary status for waste management facilities is more efficient than discretionary status because it provides certainty and focuses assessment on the effects identified by the experts. The rail corridor rezoning avoids an unnecessary constraint on the use of the Site at no material cost.	
Effectiveness	
The amended proposal (rezoning to General Industrial with the Precinct) and proposed provisions are effective to both achieve the purpose of the objectives of the Proposed Plan and to give effect to higher order documents. The tables below set out in greater detail how the provisions are appropriate to achieve the purpose of relevant objectives. The evaluation of the specific provisions	

73 Section 42A Report at [174]–[177].

77 Statement of evidence of Mark Georgeson at [5.8] and [6.4]; Statement of evidence of Fraser Colegrave at [5.61].

78 Statement of evidence of Fraser Colegrave at [5.60]–[5.61].

79 Statement of evidence of Emma McRae at [12.2]; Statement of evidence of Darran Humpheson at [8.1]; Statement of evidence of Deborah Ryan at [5.15]; Statement of evidence of Mark Georgeson at [8.3].

80 Statement of evidence of Mark Georgeson at [8.4].

81 Statement of evidence of Dr Robert McClean at [19], [49]–[52] and [56].

82 Statement of evidence of Dr Robert McClean at [57].

83 Statement of evidence of Stuart Farrant at [1.5] and [6.3]; Statement of evidence of Emma McRae at [9.2] and [11.10].

84 Statement of evidence of Fraser Colegrave at [5.74] and [8.3].

85 Statement of evidence of David Gibson at [7.18]–[7.20].

86 Statement of evidence of James Allen at [1.3], [5.1(b)] and [5.17].

Evaluation of Proposed Provision

above explains how each is effective in achieving the relevant objectives. In particular, the conditions and matters of discretion in GIZ-PREC1-R4 ensure that the effects of waste management facilities are managed, consistent with GIZ-O6, while recognising their role as infrastructure under INFSD-O3.

Risk of acting or not acting

There is sufficient information to understand the matter. The effects that could result from a General Industrial zone on the Site have been comprehensively assessed. The technical evidence addresses traffic, noise and vibration, air quality, water management, landscape and visual effects, rural productivity, economics, infrastructure, natural hazards and cultural values. It concludes that the effects of a General Industrial zone with the proposed Precinct can be appropriately managed.[87] The bulk earthworks, access and servicing for the Site have also been assessed and consented through RM220258 and RM230018.[88] The effects of a resource recovery park on the Site have been assessed in detail by the technical experts, so the risk of providing for it as a restricted discretionary activity is low. The risk of acting on the rail corridor is also low, as its effect is limited to the application of zone interface standards.

Overall Evaluation

The amendment to the zoning of the Site to General Industrial with the specific Precinct, including restricted discretionary status for waste management facilities, and the rezoning of the adjoining rail corridor to General Industrial, is considered appropriate and effective in meeting the purpose of the Proposed Plan and giving effect to relevant national policy statements. The benefits of the amendment outweigh any costs, and the risks of not acting are higher than the risks of acting.

87 Statement of evidence of Mark Georgeson at [8.3]; Statement of evidence of Darran Humpheson at [8.1]–[8.3]; Statement of evidence of Deborah Ryan at [8.2]; Statement of evidence of Stuart Farrant at [7.1]; Statement of evidence of Emma McRae at [12.1]–[12.2]; Statement of evidence of James Allen at [7.1]–[7.3]; Statement of evidence of Fraser Colegrave at [8.3]; Statement of evidence of David Gibson at [7.17], [8.6] and [8.10]; Statement of evidence of Dr Robert McClean at [19].

88 Statement of evidence of David Gibson at [5.1]–[5.16].