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 SARAH JAYNE WHITEMAN ON BEHALF OF WASTE MANAGEMENT NZ LIMITED (HEARING STREAM EIGHT)

CORPORATE

27 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 WM's submission points on 30 Benmore Crescent, Manor Park ("**Site**") in the Proposed Plan.

1.2 WM has applied for resource consents to establish and operate a resource recovery park on part of the Site. Those applications are being progressed through a separate consenting process and are not before the Panel as part of this proposed rezoning of the Site. However, my statement addresses the proposed resource recovery park as it provides relevant context to the rezoning and demonstrates the type of industrial activity the Site is well suited to, and why an appropriate zoning framework for the Site is important to WM and the wider Wellington region.

1.3 There is currently a gap in resource recovery infrastructure in the Wellington region. The region's population of nearly 550,000 people generates significant volumes of waste, with approximately 145,000 tonnes landfilled each year at Silverstream Landfill, much of it construction and demolition waste that could be diverted. Resource recovery parks are a key part of the waste network, diverting material from landfill, extending landfill life and providing community services such as reuse shops and repair cafés. A new resource recovery park is needed to meet that demand.

1.4 Finding a suitable site for a resource recovery park has taken WM approximately 20 years. Large landholdings in the Wellington region that are flat, accessible to major transport routes, appropriately separated from sensitive land uses and viable for industrial development are scarce. Over the previous two decades, alternative sites were considered and disregarded. The Site is the only viable option WM has identified to date for a facility of the scale and nature proposed.

1.5 More importantly for these proceedings, the Site is well suited to industrial use, which is why WM considers it should be rezoned for such activities. It is highly accessible to State Highway 2 ("**SH2**"), is located close to the Wairarapa Line rail corridor, is flat with suitable dimensions, and is adequately separated from residential zones. Bulk earthworks to address flood risk are largely complete, and the Wellington Fault can be accommodated by locating yard-based activities within the Fault Location Area. The NZ Transport Agency Waka Kotahi ("**NZTA**") covenant on the Site contemplates business and commercial uses and expressly anticipates a regional transfer station on Tenancy 1. The

landowner, Te Rūnanga o Toa Rangatira ("**Te Rūnanga**"), and the developer, Te Kārearea Limited ("**TKL**") (which has an agreement to lease the whole Site and is developing it as a multi-tenancy business park with its sister company, Rosco Ice Cream Limited ("**Rosco**")), also support industrial zoning of the Site.

1.6 For these reasons, WM considers that the General Industrial Zone is the appropriate zone for the Site. Retaining the General Rural Zone for a site that is isolated from other rural land and manifestly suited to industrial use would be an inefficient planning outcome. The effects of any future development, including the resource recovery park or other industrial uses, can be appropriately managed through the Proposed Plan provisions and the separate resource consent process.

2. INTRODUCTION

2.1 My full name is Sarah Jayne Whiteman.

2.2 I have been employed by WM since 2006, and I am currently the General Manager for WM South. I have held this role since 1 September 2025. Prior to this I was the Wellington Regional Manager for WM.

2.3 In this role, I am responsible for WM operations in the lower North Island (from Taupō to Wellington). This includes overseeing WM's operation at Silverstream Landfill, as well as operations at our other major facilities.

2.4 During my 20 years at WM, I have gained extensive senior leadership experience managing large-scale municipal and commercial waste operations, including oversight of multisite services, contractor performance, and customer delivery. My role has also involved significant public-sector engagement, financial and contract management, and responsibility for safety, compliance, and operational performance across complex, workforce-intensive environments.

2.5 I am authorised to give this evidence on behalf of WM.

3. SCOPE OF EVIDENCE

3.1 This statement of evidence will:

(a) provide an overview of WM's operations and the proposed resource recovery park at the Site;

(b) describe the key features of the Site and its suitability for industrial activities, including WM's proposed resource recovery park; and

(c) set out WM's support for the proposed rezoning of the Site from General Rural to General Industrial.

4. WM OPERATIONS

4.1 WM is New Zealand's largest waste and environmental services company. With a history dating back to 1935, WM has been at the forefront of waste management in New Zealand for more than 90 years. The company is the market leader in the waste sector in New Zealand with an established national network of vertically integrated local waste and environmental management services.

4.2 Our waste network covers the full spectrum of waste services, including collection, processing, recycling, resource recovery, and disposal of residual waste. WM owns or has operational interests in multiple landfills, refuse transfer stations, materials recovery facilities, and other waste services across New Zealand. This integrated approach enables WM to provide efficient, end-to-end waste management solutions that maximise resource recovery and minimise waste to landfill.

4.3 WM invests more than $50 million annually in new capital works across more than 90 locations and directly employs over 2,000 New Zealanders. The company's scale, experience, and commitment to investment in modern waste infrastructure position it as a responsible and capable operator of the proposed resource recovery park.

4.4 In Lower Hutt, and the wider Wellington region, WM has a well-established operational presence. As described in Mr Howie's evidence for Hearing Stream Two (Business)[1] and Mr Bezuidenhout's evidence for Hearing Stream Six (Infrastructure),[2] WM operates:

(a) a hazardous waste facility at 57-59 Port Road, Seaview (including heavy metal waste processing, contaminated soil stockpiling, and medical waste container washing);

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1 Statement of Evidence of David Howie (Hearing Stream Two) dated 8 May 2026 at [1].

2 Statement of Evidence of Willem Bezuidenhout (Hearing Stream Six) dated 7 September 2026 at [16].

(b) the Seaview Refuse Transfer Station at 27 Seaview Road (which undertakes recycling operations and collects general domestic, green, and commercial solid waste for processing and transfer); and

(c) a depot at 97-99 Port Road.

4.5 WM has also lodged district and regional resource consent applications for a resource recovery park at the Site.[3] I note that the reporting planner for Hutt City Council ("**HCC**") refers to the application as being for both a waste transfer station and a resource recovery park. To clarify, the transfer station is part of the proposed resource recovery park. Mr Howie explained the functions of a resource recovery park in his evidence for Hearing Stream Two dated 8 May 2026.[4]

4.6 WM is also contracted by HCC to undertake kerbside collection of municipal waste from across Hutt City.[5] The volume of waste involved is substantial. Approximately 145,000 tonnes of waste from across the Wellington region is landfilled each year at Silverstream Landfill, around 400 tonnes every day.[6] Each year, that is roughly enough waste to fill a building the size of a rugby field that is 13 storeys high.[7] To manage this waste responsibly, WM relies on transfer and resource recovery facilities where waste can be processed, sorted, and diverted from landfill.

4.7 There is currently a clear gap in critical waste infrastructure in the Wellington region. A resource recovery park is required to meet growing demand for waste services in the region and to support waste minimisation. Demand for waste services continues to grow. An additional 103,770 households are forecast to be needed in the greater Wellington region by 2051,[8] and volumes of municipal and construction and demolition waste will increase as a result.

4.8 The resource recovery park will support the regional targets of reducing the total amount of material that needs final disposal to landfill by 10% by 2027

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3 Identified as RM230019 (Hutt City Council) and WGN230031 (Greater Wellington Regional Council).

4 Statement of Evidence of David Howie (Hearing Stream Two) dated 8 May 2026 at [3] and [19]–[25].

5 Statement of Evidence of Willem Bezuidenhout (Hearing Stream Six) dated 7 September 2026 at [17]-[18].

6 Statement of Evidence of Willem Bezuidenhout (Hearing Stream Six) dated 7 September 2026 at [17].

7 Statement of Evidence of Willem Bezuidenhout (Hearing Stream Six) dated 7 September 2026 at [17].

8 Wellington Regional Housing and Business Development Capacity Assessment – Housing Update (May 2022) at 6.

and 30% by 2030, including the sub-targets of making construction and demolition waste processing and recovery available in the Wellington region and adding five new resource recovery locations to the regional network by 2030.[9] It brings together, in one place, facilities that implement each stage of the waste hierarchy. Without facilities of this kind, waste would be transported directly to landfill, which does not encourage reuse and is a less efficient use of landfill airspace. It is therefore critical that appropriate land in Hutt City and Wellington, like the Site, have the zoning to support these and other types of industrial uses.

5. THE SITE

5.1 WM has undertaken an extensive search for a suitable site for a resource recovery park over approximately 20 years. The search has been challenging due to the scarcity of large landholdings in the Wellington region that are adequately sized, accessible to transport routes, of suitable topography, well-positioned, and viable for industrial development. These are all factors which if present, in my view, would make a site in the region suitable for an industrial zoning.

5.2 As WM is not a requiring authority, it is reliant on suitable sites becoming available on the market. We have worked with a property adviser throughout our searches for a suitable site and have obtained advice on potential sites as they have arisen. Several alternative sites were carefully considered over the years and disregarded because one or more factors made them unsuitable. The Site was ultimately identified as the most suitable location in the Wellington region for the proposed resource recovery park and is, in WM's view, the only viable option that WM has identified to date for a resource recovery park of the scale and nature proposed.

5.3 Our identification of this Site as being suitable for our proposed operations also considered its suitability for re-zoning, noting its existing Rural zoning under the operative District Plan, to an industrial zoning, which would much better support the activities we (and others within the landholding) intend to undertake.

5.4 The Site, which is approximately 13.21 hectares, is owned by Te Rūnanga. Dr McClean and Mr Gibson outline the history of the Site and the agreements

[9] Wellington Region Waste Management and Minimisation Plan 2023-2029 at 4 and 27.

between Te Rūnanga and TKL for its development and lease.[10] Under those arrangements, TKL has agreed to lease the whole Site from Te Rūnanga. WM has entered into an agreement with TKL to sub-lease part of the Site for a resource recovery park.

5.5 The alignment of WM's interests with those of Te Rūnanga (as landowner) and TKL and Rosco (as developer) is significant – all three parties support rezoning to enable appropriate land uses on the Site through their respective submissions on the Proposed Plan, with Te Rūnanga seeking a special purpose industrial zone.

Site suitability

5.6 The Site was selected by WM for the following key reasons:

(a) **Accessibility:** The Site is highly accessible to major transport routes, notably SH2. This strategic location enables efficient collection and transport of waste from across the Wellington region. It is convenient for customers to access.

(b) **Topography and dimensions:** The Site is flat and has suitable dimensions to allow for the industrial activity proposed. Following substantial earthworks undertaken by Rosco and TKL (now largely complete),[11] the Site is well positioned for development.

(c) **Fault line considerations:** The Site's location relative to the Wellington Fault enables industrial activities to use the area outside the earthquake fault line no-build zone, with yard-based activities appropriately located within the Fault Location Area. The evidence of Ms Goodwin for Hearing Stream Five (Natural Hazards) addresses these provisions in detail.[12] WM requires outdoor space for truck parking and can therefore use the entire Site, including the no-build zone.

(d) **Positioning of the Site:** The Site is located between SH2, the Wairarapa Line rail corridor and Te Awa Kairangi / Hutt River. The

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10 Statement of Evidence of Dr Robert McClean (Hearing Stream Eight) dated 27 October 2026 at [55]-[62]; Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [4.1]-[4.4].

11 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.3] and [5.5].

12 Statement of Evidence of Angela Goodwin (Hearing Stream Five) dated 5 August 2026 at [15]-[20].

Wairarapa Line rail corridor and SH2 are not sensitive to effects of the activity and provide some separation between the Site and the wider area including Mary Huse Grove to the east.

(e) **Flood hazard management:** Bulk earthworks have lifted the Site above the level of a Te Awa Kairangi / Hutt River flood with a 1-in-440-year probability. As set out in the evidence of Mr Philip Wallace for Hearing Stream Five (Natural Hazards), updated modelling shows the earthworks have raised the Site platform above the predicted 1% AEP flood level (allowing for climate change to 2130), with more than adequate freeboard.[13]

(f) **Potential for appropriate re-zoning:** Given the above factors, and based on the advice we received from our consultants, WM came to the conclusion that the Site was better suited to an industrial zoning under the District Plan. While WM considers its proposed development is able to be consented under the current (and notified Proposed Plan) rural zoning, an industrial zoning which the Site could support is important for both the consenting, and future ongoing operation of, any such resource recovery park (should it be consented and established), as well as the development of the remainder of the Site, in a complementary manner.

NZTA Covenant

5.7 I understand Rosco/TKL has entered into a Developer Agreement with NZTA. This agreement requires a covenant in favour of the NZTA relating to land use restrictions associated with the proximity of the Site to SH2 and the SH2/SH58 Haywards Interchange to be registered as an instrument on the record of title. Mr David Gibson sets out details of this covenant and what it requires.[14]

5.8 In summary, I understand both the proposed re-zoning of the Site and WM's proposed resource recovery park are fully consistent with the terms of the NZTA covenant as currently drafted. The covenant expressly contemplates the proposed activity and the community-focused services that form part of modern resource recovery parks.

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13 Statement of Evidence of Philip Wallace (Hearing Stream Five) dated 5 August 2026 at [1] and [18]-[20].

14 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.13]-[5.14].

Consenting and Development

5.9 While not directly relevant to this Panel's consideration of the rezoning proposal, I set out brief context on WM's consenting status to provide context to the rezoning requested and, in particular, why WM considers the Site is suitable for industrial re-zoning and subsequent development.

5.10 WM applied to HCC for a land use consent to establish and operate a resource recovery park, and to Greater Wellington Regional Council ("**GWRC**") for discharge consents to discharge odour and dust to air and stormwater.[15] The land use consent application was lodged in 2023 and publicly notified, attracting more than 170 submissions. The associated regional consent applications, lodged in 2025, are currently on hold pending section 92 responses and notification. WM has requested direct referral of all three consent applications to the Environment Court so they can be heard together. Decisions on those requests remain pending, as direct referral of the regional consent applications cannot be decided until those applications have been notified.

5.11 As set out by Mr Gibson, to prepare the Site for development and address flood risk, Rosco obtained resource consents from HCC and GWRC to remove vegetation, undertake bulk earthworks and upgrade culverts on the wider Site, while retaining a riparian corridor along Dry Creek.[16] The earthworks raise the Site platform above the 1-in-440-year Te Awa Kairangi / Hutt River flood plain, so that future buildings will sit above 28.0m above mean sea level as the Operative District Plan requires.[17] Those works are now largely complete, and consent has also been granted for the roading and civil infrastructure to service the Site. As a result, the Site is well positioned for the development of a resource recovery park.

5.12 WM is comfortable with the site-specific provisions proposed for the Site and considers these will ensure the Site is developed appropriately. Ms Goodwin's planning evidence addresses the proposed provisions in detail.[18]

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15 Identified as RM230019 (Hutt City Council) and WGN230031 (Greater Wellington Regional Council).

16 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.1] and [5.3].

17 Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.5].

18 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at [5.4] and Attachment 1.

5.13 WM operates several refuse and recycling transfer stations across New Zealand and a resource recovery park in Hamilton. As set out by Mr Howie during Hearing Stream Two, resource recovery parks are large-scale operations that provide additional services to the public and local community beyond the general collection, consolidation, and transportation of waste.[19] For example, resource recovery parks provide free drop-off services for reusable items, clothing, and household items. Sites may also have a reuse shop or a repair café in conjunction with the local community. The proposed resource recovery park at the Site would provide similar community-focused services to the Wellington region, including an education centre.

5.14 In summary, the Site is uniquely suited to a resource recovery park and, more generally, to industrial activities. It benefits from its strategic location in proximity to transport routes, adequate separation, and optimal topography. The Site has undergone significant earthworks to address flood risk, enhancing its suitability for long-term industrial and resource recovery activities. The Site's suitability is reinforced by the identified need for additional waste management infrastructure to service Hutt City and the greater Wellington region, and by the scarcity of alternative sites that meet the necessary criteria.

6. PROPOSED REZONING OF THE SITE

6.1 WM is seeking General Industrial zoning for the Site to ensure appropriate planning provisions for the intended industrial use of the Site, including (but not limited to) the future intended use of part of it for a resource recovery park. The planning evidence of Ms Goodwin addresses why this zoning, or a special purpose zone, is appropriate and consistent with the relevant policy framework.[20]

6.2 The Site's proposed rezoning aligns with the interests of Te Rūnanga (as landowner) and TKL and Rosco (as developer), both of whom support industrial zoning for the Site through their own submissions. Te Rūnanga has submitted in support of a special purpose industrial zone, which WM also supports as an alternative zone if preferred by HCC or the Panel.

6.3 WM is confident that the proposed provisions for the Site as set out in Ms Goodwin's evidence, combined with the resource consent process, will ensure that the Site is developed appropriately and that effects on the surrounding

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19 Statement of Evidence of David Howie (Hearing Stream Two) dated 8 May 2026 at [21].

20 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at section 5.

environment are properly managed.[21] The range of expert evidence filed in support of WM's submission, covering planning, economics, site servicing and other matters demonstrates the Site is appropriate for industrial zoning.

6.4 Rezoning is therefore important to WM from an ongoing operational perspective. A resource recovery park is long-term infrastructure that requires significant capital investment and will operate for many decades. While WM considers its proposed resource recovery park can be consented with the current (and notified Proposed Plan) rural zoning, an industrial zoning is still more appropriate for an activity of this nature. In particular, it is important to WM that the Site is also rezoned to support the long-term intended operation of industrial activities on the Site, in a manner that complements WM's proposed operations and which also appropriately manages any potential adverse effects on our neighbours. A rural zoning will not most efficiently and effectively achieve this, in my view.

7. ALTERNATIVES

7.1 I note that Mr Colegrave refers to the recent establishment of a facility at Porirua that provides sorting of construction and demolition waste.[22] While not directly relevant to this Panel's consideration of the rezoning proposal, this facility does not lessen the need for sorting of construction and demolition waste within the Wellington region and Hutt City and for the Site to be rezoned Industrial. A large portion of the waste stream disposed of at Silverstream Landfill is construction and demolition waste and a lot of this material could be diverted. The Site will assist with this.

7.2 Mr Colegrave also refers to the 2025 Industrial Land Study, which identified other potential industrial land areas. As set out at paragraph 5.6(a), the facility needs to be close to the population it serves (which I expect would be the case for many other industrial activities). Costs increase, and efficiency decreases, with the distance waste needs to be transported. For these reasons, a site outside Hutt City is less desirable. WM would not be able to viably operate a resource recovery park in Horowhenua to serve the Hutt City community.[23]

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21 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at [1.5] and [8.1].

22 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.67].

23 Statement of Evidence of Fraser Colegrave (Hearing Stream Eight) dated 27 October 2026 at [5.33]-[5.42] and [5.43]-[5.51].

7.3 Expanding WM's existing transfer station at Seaview is also not a practical option, because that site is not large enough for the modern, fit-for-purpose facility required. This illustrates a wider difficulty with relying on existing sites for waste management facilities: they are constrained by their size and characteristics. In my view, this further illustrates the importance of rezoning the Site to General Industrial.

8. CONCLUSION

8.1 For the reasons set out in this evidence, WM respectfully requests that the Panel endorse the rezoning of the Site from General Rural to General Industrial Zone or similar. The evidence filed in support of WM's position demonstrates that the proposed rezoning is appropriate, that the Site is uniquely suited to industrial activities including a resource recovery park, and that the rezoning of the Site is in the public interest.

8.2 The proposed resource recovery park, which the requested rezoning will help facilitate and protect going forward, will address a current gap in regional waste infrastructure, providing essential services for waste diversion, recycling, and resource recovery that currently do not exist at this scale in the Wellington region. The facility will also provide community-focused services including free drop-off facilities for reusable items, a reuse shop, and a repair café, supporting waste minimisation outcomes for the local community. While the resource recovery park provides context to a future use of the Site, I acknowledge the case for rezoning rests on the Site's suitability for industrial use more broadly, which WM and TKL's experts have comprehensively addressed.

8.3 WM is committed to working constructively with the Council, the community, and other stakeholders to ensure that the Site is developed appropriately and that the resource recovery park delivers lasting benefits for the region.

Sarah Jayne Whiteman

27 October 2026