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 DAVID GIBSON ON BEHALF OF TE KĀREAREA LIMITED (HEARING STREAM EIGHT)

PLANNING

27 OCTOBER 2026

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1. EXECUTIVE SUMMARY

1.1 This statement of evidence is prepared on behalf of Te Kārearea Limited ("**TKL**") and Rosco Ice Cream Ltd ("**Rosco**") Submitter #447.

1.2 The submission addressed the zoning of the site at 30 Benmore Crescent, Manor Park ("**Site**"), seeking a General Industrial zoning of the Site with site-specific provisions, and seeking that the rail corridor adjacent to the Site also be zoned General Industrial.

1.3 TKL / Rosco made further submissions supporting the original submissions lodged by Waste Management NZ Ltd ("**WM**") and supporting the original submission lodged by Te Rūnanga o Toa Rangatira ("**Ngāti Toa Rangatira**").

1.4 TKL / Rosco also made further submissions opposing the original submissions lodged by the Manor Park and Haywards Residents Community Incorporated Society ("**Residents' Society**") as well as opposing numerous individual submissions seeking to retain a General Rural zoning for the Site or seeking that the Site not be zoned for industrial purposes.

1.5 I agree with the reporting planner's recommendation for General Industrial zoning of the Site with a precinct, and suggest further site-specific provisions to manage the potential effects identified by the technical experts. In my opinion, this is the most appropriate way to achieve the objectives of the Proposed Plan, the National Policy Statement on Urban Development 2020 ("**NPS-UD**") and the purpose of the RMA.

1.6 The technical evidence shows that the potential effects of general industrial activities at the Site, which is adjacent to State Highway Two ("**SH2**"), the Wairarapa Railway Line and the Te Awa Kairangi (Hutt River) corridor, while also being near to the residential area at Mary Huse Grove, can be managed through the precinct provisions, the district-wide provisions of the Proposed Plan and the Natural Resources Plan for the Wellington Region ("**Natural Resources Plan**") administered by Greater Wellington Regional Council ("**GWRC**").

1.7 The Site is able to be serviced with roading and access infrastructure suitable for the activities envisaged from the General Industrial Zone. Additionally, the Site can be serviced with three waters infrastructure. This infrastructure is already authorised by resource consent. It will be funded by TKL.

2. INTRODUCTION

2.1 My full name is Alexander David Gibson, and I am a Technical Director with the firm of Spencer Holmes Limited. I hold a Bachelor of Surveying from the University of New South Wales, and I am an Associate member of the New Zealand Planning Institute (NZPI) as well as a Professional member of Survey and Spatial New Zealand (S+SNZ). I have worked in the resource management planning field for thirty years.

Code of conduct

2.2 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I will continue to comply with it when giving oral evidence. Except where I state that I am relying on the evidence of another person, the issues addressed in this evidence are within my area of expertise, and I have not omitted material facts known to me that might alter or detract from my evidence.

3. SCOPE OF EVIDENCE

3.1 This statement of evidence will address:

(a) Site ownership and interests;

(b) relevant resource consents;

(c) transportation effects;

(d) infrastructure and stormwater effects;

(e) natural hazard risks;

(f) briefly address the Council's Section 42A Report prepared by Hutt City Council ("**HCC**") dated 12 October 2026 ("**Section 42A Report**") as it relates to these matters including the rail corridor zoning;

(g) respond to the relief sought by the Residents' Society and other submitters in relation to zoning matters; and

(h) set out my conclusions and recommendations in relation to the appropriate zoning of the Site under the Proposed Plan.

3.2 I note that the evidence of Ms Goodwin will address relevant statutory and policy framework matters in respect of the zoning of the Site. I have read the evidence of Ms Goodwin and agree with her assessment and recommendations.

3.3 I confirm that I have read the following documents in preparing my evidence:

(a) relevant submissions and further submissions including those of the Residents' Society, WM and Ngāti Toa Rangatira (353). I have also read the template submissions referred to in the Section 42A Report as Submitter Group A;

(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 Ngāti Toa Rangatira.

4. SITE OWNERSHIP

4.1 The Site is owned by Te Rūnanga o Toa Rangatira Incorporated. It was reacquired by Ngāti Toa Rangatira under the Ngāti Toa Rangatira Claims Settlement Act 2014. It is legally described as Section 1 SO 493901 and held in Record of Title 738223. The Site consists of 13.2121 ha.

4.2 TKL has entered into an agreement in principle with the owners to lease the land for 125 years. The intention is that TKL will develop the land in a manner that is supported by the owners.

4.3 To this end, the objective of TKL is to develop the Site as a multi-tenancy industrial park to accommodate tenants that require large footprint buildings and yard areas for access and parking. Future tenants could involve clothing manufacturers, infrastructure maintenance, truck servicing and freight services.

4.4 Subsequently, TKL has entered into an agreement in principle with WM to operate a resource recovery park on part of the Site at the southern end (which is subject to a separate consent process). The WM resource recovery park has been discussed between TKL and WM with Ngāti Toa Rangatira, who are supportive of the WM proposal, as it would meet the demands of the future generations of the Wellington region.

4.5 The Site has not been used for rural production for around 30 years since the Wairarapa Railway was constructed. Historic aerial imagery shows pastoral grazing and horticulture on the Site in the 1950s, with gravel extraction established over the southern part of the Site by the mid-1960s. Both activities had effectively ceased by around 1995. Since then, the Site has been used for light industrial purposes, largely associated with roading and railway projects, together with informal material storage[1]. The southern end of the Site was used for a recreational paintball activity in the 1990s.

5. RELEVANT RESOURCE CONSENTS

5.1 TKL has obtained the following resource consents:

(a) For bulk earthworks over the majority of the Site (excluding a riparian corridor for Dry Creek) that would create flat useable areas and raise low areas of the Site above flood levels.

(i) RM220258 (HCC); and

(ii) WGN230031 (GWRC).

(b) For roading upgrades and vehicle access (on and off site) to facilitate up to 2,900 vehicle movements a day, plus installation of three waters infrastructure for future use and development of the Site.

(i) RM230018 (HCC); and

(ii) A section 176 approval from KiwiRail Holdings Ltd ("**KiwiRail**") for upgrades to the Manor Park level crossing.

(iii) A section 176 approval from NZTA is pending registration of a land covenant on the record of title for the Site.

5.2 TKL has a development agreement with NZTA for the road upgrades approved under RM230018, proposed to serve the Site. I discuss relevant details of this agreement further below.

5.3 The bulk earthworks under RM220258 and WGN230031 have largely been completed on the eastern side of the Site between Dry Creek and the railway corridor. The approved earthworks on the western (SH2) side of the Site and the Dry Creek culvert upgrades are still to be completed.

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[1] Section 42A Report at [22]-[23] and [115]-[118]; Statement of Evidence of James Allen (Hearing Stream Eight) dated 27 October 2026 at [6.3].

5.4 While the physical roading upgrades and vehicle access works approved by RM230018 have not yet commenced, TKL is currently progressing the engineering approvals required by the "pre-commencement" consent conditions. Consequently, these roading works are considered to form part of the anticipated environment since TKL has committed to progress the works needed in order to implement the consent.

Bulk Earthworks – RM220258

5.5 The approved earthworks create approximately 106,000m^2 of flat land, which is approximately 80% of the Site. The resource consent authorises approximately 130,000m^3 of cut and 160,000m^3 of fill (including up to 100,000m^3 of imported fill), placed as compacted engineered fill over the natural alluvial gravels. The earthworks raise the building platforms above RL 28.0m, being the minimum level for buildings under the Operative Hutt City District Plan ("**Operative District Plan**"). Under the operative General Rural zoning of the Site, vegetation removal at the Site is not restricted and has been undertaken as a permitted activity and in accordance with the Wildlife Act 1953.

5.6 The conditions of RM220258 require that the final completed surface is either paved, metalled, re-grassed or planted. Currently the surface of the largely completed area has been left as a compacted metal as these areas are likely to be used for vehicle traffic or buildings in the future (subject to obtaining the necessary resource consents).

5.7 I note that a requirement of RM220258 (condition 12) is for the Dry Creek riparian corridor to be planted. A minimum 20m wide corridor is to be planted. A proposed planting plan has been approved by HCC, which is outlined in the evidence of Ms McRae[2].

5.8 As I discuss below, this planting requirement is also carried through the RM230018 (condition 13) with the addition of further planting around the perimeter of the Site.

5.9 A current aerial image of the Site (by drone survey October 2026) is included as **Attachment 1**.

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[2] Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [2.8(a)] and [5.5].

Road Upgrades – RM230018

5.10 The main feature of RM230018 is to upgrade the intersection of Manor Park Road and Benmore Crescent at the bottom of the Manor Park on/off ramp to the Haywards interchange on SH2, shown in **Attachment 2**. The details of the Manor Park Road upgrades to create a dedicated right turn bay into Benmore Crescent plus a new railway level crossing are outlined in the evidence of Mr Georgeson[3]. Pedestrian infrastructure improvements are also proposed on Benmore Crescent and Manor Park Road.

5.11 The roading upgrades are intended to facilitate up to 2,900 vehicle movements a day to and from the Site, being a mix of passenger vehicles and heavy vehicles. The daily limit of 2,900 vehicle movements has been imposed as a condition of RM230018. A subsequent condition requires that the landowner registers a land covenant on the record of title in favour of Council that limits the traffic generation for the Site to a maximum of 2,900 vehicle movements per day.

5.12 In gaining approval for RM230018, TKL undertook extensive consultation with NZTA in respect of the design geometry and widths of the road upgrades. That consultation resulted in TKL entering into a development agreement with NZTA. Subsequently NZTA provided its written approval to RM230018 for the purposes of section 95E of the RMA.

5.13 A condition of the development agreement is that a land covenant is to be registered on the record of title for the Site in favour of NZTA. The covenant outlines certain restricted uses at the Site and sets traffic movement related limits as well. Under the terms of TKL's development agreement with NZTA, once the covenant is registered on the title, NZTA will provide its approval under section 176 of the RMA in respect of the works within the SH2 designation.

5.14 The proposed land covenant also expressly acknowledges that part of the Site may be occupied by a regional land transfer station (the subject of a resource consent application).

5.15 TKL also engaged with KiwiRail in respect of the level crossing upgrades within its designation, and KiwiRail also provided its written approval and section 176 approval in late 2024. Consent was granted to RM230018 on 27 January 2025.

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[3] Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [1.3], [5.3] and [5.8].

5.16 A further requirement of RM230018 is for extensive planting to be undertaken around the perimeters of the Site. This includes planting within the GWRC land to the south of the Site beside the Te Awa Kairangi river trail. The proposed planting is outlined in the evidence of Ms McRae[4].

5.17 The remaining aspects of RM230018 are an internal access road within the Site together with three waters provisions for the Site. Currently TKL is progressing the final engineering design requirements with NZTA, KiwiRail and HCC in order to give effect to this consent.

Other Current Resource Consents

5.18 WM has also lodged the following resource consent applications in respect of the proposal to establish and operate a resource recovery park at the Site:

(a) RM230019 (HCC – land use);

(b) WGN250271 (GWRC – air discharge); and

(c) WGN260460 (GWRC – stormwater discharge and impervious areas).

5.19 These resource consent applications have not yet been determined. HCC has publicly notified RM230019 and the application is subject to a further information request post notification. The GWRC consent applications are also subject to further information requests and are intended to be publicly notified as well.

5.20 Those applications are being determined through a separate consenting process and are not before the Panel. For completeness, where I refer to the resource recovery park in my evidence, it is as relevant context illustrating the type of industrial activity the Site can accommodate; my conclusions on the appropriateness of General Industrial zoning do not depend on it.

6. TRANSPORTATION EFFECTS

6.1 The TKL submission sought that the Site is zoned General Industrial with specific provisions for traffic generation rather than relying on the 'high trip generator' provisions of the Transport Chapter of the Proposed Plan.

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4 Statement of Evidence of Emma McRae (Hearing Stream Eight) dated 27 October 2026 at [2.8(b)], [2.9] and [5.5].

6.2 I note that regardless of the zoning of a site, the Transport Chapter provisions apply to all proposed activities. Of particular relevance to the Site is rule TR-R3 (trip generation). This rule refers to the High Trip Generating Activity Thresholds contained in Table 8 of the Transport Chapter. For industrial activities there is a Gross Floor Area ("**GFA**") limit of 5,000m^2 for buildings used for warehousing / storage or a limit of 2,000m^2 for buildings used for manufacturing. That is, buildings for warehousing or manufacturing that exceed these GFA limits are assumed to generate high vehicle movements. Other industrial activities would fall under the 'other activities' default category with a limit of 200 vehicle trips per day.

6.3 As detailed in Mr Georgeson's evidence, the Site has been subject to a recent transportation assessment as part of the approved resource consent RM230018[5]. The transportation assessment found that the Site could generate up to 2,900 daily traffic movements without creating congestion or safety effects on Manor Park Road or the Manor Park Interchange on SH2. The assessment was on the basis that the proposed roading upgrades at Manor Park Road and Benmore Crescent were completed.

6.4 The traffic assessment undertaken for RM230018 would be in the same form as would be required under the Transport Chapter rules and standards of the Proposed Plan. Consequently, Mr Georgeson considers that, because a site specific traffic assessment has been completed, further assessment of traffic effects under the Transport Chapter is not necessary[6]. Instead, the Proposed Plan should make use of a site-specific rule that requires future activities on the Site to demonstrate how the roading upgrade works and traffic movement limits can be achieved. Accordingly, Ms Goodwin proposes a traffic generation rule for the Site as GIZ-PREC1-R13[7].

6.5 In my opinion, the precinct rule GIZ-PREC1-R13 proposed by Ms Goodwin would ensure that any future activities and uses of the Site would achieve the traffic outcomes envisaged by the traffic assessments undertaken for RM230018. Therefore, any potential traffic related effects from zoning the Site as General Industrial would be appropriately managed and mitigated.

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5 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [2.5] and [5.9].

6 Statement of Evidence of Mark Georgeson (Hearing Stream Eight) dated 27 October 2026 at [6.7] and [6.10].

7 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 27 October 2026 at [4.10] and Attachment 1 (GIZ-PREC1-R13).

7. INFRASTRUCTURE AND STORMWATER EFFECTS

7.1 Given the history of the Site and its previous General Rural zoning, the Site has little public infrastructure. That is, there is no public potable water supply available to the Site. There is no public stormwater reticulation available to the Site.

7.2 A large Council trunk wastewater main (Ø825mm) passes through the Site (including passing under Dry Creek) with a short branch main in the northern corner of the Site. There are also overhead power lines passing through the western side of the Site.

7.3 Therefore, any development or use of the Site requires new infrastructure to be provided to the Site.

7.4 Consequently, RM230018 included approval to extend the public potable water network into the Site, as well as a new wastewater network connecting to the trunk main near the southern end of the Site. The resource consent also provided for the reticulation of a stormwater network through the eastern side of the Site. The stormwater network includes a discharge to Dry Creek as there is no existing public network for the Site to drain into.

Water Supply

7.5 HCC has approved a limited water supply to the Site under RM230018. The proposed water supply would be extended from the intersection of Manor Park Road and Mary Huse Grove, under the railway and along Benmore Crescent. At the frontage of the Site, the water supply would be limited to a flow rate of 5.2 L/s. This is because the Haywards Reservoir is of limited capacity (230m^3) and to avoid effects on the existing Manor Park water supply network.

7.6 As a result, all future uses of the Site will need to store water for firefighting purposes. For example, the storage required for the resource recovery park would involve a tank to hold 650$m.^3$ Additionally, future uses may also need to store water for day-to-day purposes, depending on the quantity of water demand by the new uses.

7.7 Accordingly, it has been demonstrated through RM230018 that a suitable water supply can be provided for the Site, subject to specific flow and on-site storage requirements, that would appropriately support future use of the Site for general industrial activities.

Wastewater

7.8 A new wastewater network for the eastern side of the Site has been approved in principle by HCC under the conditions of RM230018. As the connection point to the existing trunk main is on the western side of Dry Creek, the proposed network involves an aerial bridge crossing of Dry Creek. The bridge crossing can be achieved in compliance with the Natural Resources Plan's requirements and would be located above the 100-year event flood levels in Dry Creek.

7.9 Again, it has been demonstrated through RM230018 that a suitable wastewater network can be provided for the Site that would appropriately support future use of the Site for general industrial activities.

Stormwater

7.10 As future use of the Site for general industrial activities is likely to involve new impervious surfaces and large buildings, these uses will require approvals under the Natural Resources Plan. In my opinion, the Site can accommodate appropriate stormwater solutions as required by the Natural Resources Plan to support future use of the Site for industrial purposes.

7.11 While the resource recovery park is subject to a separate consent process, the proposed stormwater management systems for it demonstrate that appropriate stormwater solutions can be provided for the Site as required by the Natural Resources Plan (in terms of contaminant treatment and control of discharge volume) that would appropriately support future use of the Site for general industrial activities[8].

7.12 Plan Change 1 (including Variation 1) to the Natural Resources Plan requires all sites in the Whaitua Te Whanganui-a-Tara that develop impervious areas over 1,000m^2 to obtain a resource consent to control stormwater contaminants and the volume of stormwater discharged for the impervious area. These controls are applied to the frequent small rain events (such as events up to a typical two year event). That is, large scale infrequent events are not subject to these Natural Resources Plan's controls. The management of the volume of stormwater discharged from the site is known as "Hydrological Control".

7.13 Guidance issued by GWRC outlines that the first 25mm of rainfall should be controlled to meet the objective of the Natural Resources Plan. Hydrological

[8] Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [5.9]–[5.16] and [7.1]–[7.2].

control can be achieved by capturing the first 25mm of stormwater runoff and re-using the stored water for non-potable purposes, or by discharging the stored water to ground so that it doesn't enter water courses and riparian margins.

7.14 An example of the likely stormwater management systems are shown in WM's resource consent application with GWRC for stormwater discharges and impervious areas associated with the proposed resource recovery park. The proposed stormwater management system intends to utilise significant re-use of non-potable water collected from the building roofs, as well as numerous raingardens to treat the stormwater runoff from the impervious ground surfaces.

7.15 As discussed by Mr Farrant[9], the Site is suitably located on the valley floor such that stormwater discharge to ground is a viable option given the porous soils and river gravels underlying the Site. Hence the stormwater management system for the proposed resource recovery park includes on-site soakage systems as the primary method to discharge stormwater from the Site. This includes the design of raingardens with open bases that would also allow discharge to ground after treatment through the specifically formulated soil media.

7.16 The evidence of Mr Farrant[10] concludes that stormwater runoff from industrial use of the Site can be appropriately managed in accordance with the requirements of the Natural Resources Plan with no undue risk to the downstream watercourses.

Infrastructure Conclusion

7.17 The approval of RM230018 and the design solutions proposed for the GWRC resource consent application for the resource recovery park demonstrate that appropriate stormwater management systems can be provided for the Site that achieve the outcomes sought by the Natural Resources Plan such that future use of the Site for general industrial activities is consistent with the objectives and outcomes of the Proposed Plan.

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9 Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [4.10] and [5.11].

10 Statement of Evidence of Stuart Farrant (Hearing Stream Eight) dated 27 October 2026 at [1.5] and [7.1]-[7.3].

7.18 Clause 3.3(2)(b) of the NPS-UD requires Council to provide sufficient development capacity for business land that is infrastructure ready. The requirements for land to be infrastructure ready are outlined at clause 3.4(3).

7.19 Clause 3.4(3)(d) outlines that infrastructure ready in the short term qualifies if there is adequate existing infrastructure for the land. Given the lack of existing infrastructure, the Site could not be considered to meet the requirements to be infrastructure ready in the short term. However, the Site can be considered to be infrastructure ready in the medium term as there is funding available for the required infrastructure. The infrastructure funding is not identified in the Council's long-term plan, instead it is funded through the developer (TKL). Nevertheless, the outcome is the same. Therefore, zoning the Site General Industrial meets the requirements of the NPS-UD.

7.20 I note that under the precinct provisions that Ms Goodwin presents, any use of the Site would be a non-complying activity if undertaken prior to the infrastructure being in place. The intent of this is to ensure the Site is infrastructure ready and all future uses can be serviced appropriately.

8. NATURAL HAZARD RISKS

8.1 The Site is bisected by the Wellington faultline and has been identified as subject to flooding in the Proposed Plan.

Wellington Faultline

8.2 The mapping of the Wellington faultline and the associated fault avoidance area within the Site was a matter addressed during Hearing Stream 5 (Natural Hazards). This resulted in a Joint Witness Statement in which agreement was reached between myself and Dr Litchfield (for HCC) regarding the mapping of the Fault Location Area within the Site[11]. I note that the Fault Location Area includes a 20m setback from the estimated position of the faultline.

8.3 Accordingly, it is appropriate that the Fault Location Area rules under the Natural Hazards chapter of the Proposed Plan apply to the Site. However, the Natural Hazards rules would always apply to the Site regardless of the zoning of the Site.

8.4 Despite the Fault Location Area affecting the Site, there are large areas of the Site that are beyond the Fault Location Area and are therefore able to be

11 Joint Witness Statement (Hearing Stream Five) dated 24 September 2026.

developed with buildings, subject to meeting the Building Code and other requirements of the Proposed Plan.

8.5 With reference to the evidence of Mr Colegrave, Ms Whiteman and Ms Goodwin, there are likely to be uses that could establish in a General Industrial Zone that also require yard or parking areas. These ancillary uses could be located within the Fault Location Area, for efficient use of the Site.

8.6 Therefore, the presence of the Wellington faultline through the Site is not a significant risk for development of the Site that would make General Industrial zoning of the Site inappropriate.

Flooding

8.7 The extent of any flood hazard within the Site was also a matter addressed during Hearing Stream 5 (Natural Hazards). The recommendation of the Council's reporting officer was to largely support the TKL submission and remove the flood hazard from the Site, with the exception of the Dry Creek stream corridor. The Officer's recommendation was based on flood modelling advice from Tiaki Wai.

8.8 Additionally, Minute 14 from the Panel[12] requests that Council undertakes remodelling of the flood hazard mapping for the whole city based on different climate change parameters than were used for the original flood hazard mapping.

8.9 Consequently, I expect that the new flood hazard mapping in respect of the Site would confirm that only the Dry Creek stream corridor through the Site would be subject to flooding. This is consistent with Mr Wallace's Hearing Stream 5 modelling, which already allows for climate change to 2130[13].

8.10 Therefore, the potential flooding hazard to the Site would be limited to the Dry Creek stream corridor, which does not present a significant risk for development of the Site such that a General Industrial zoning of the Site would be inappropriate.

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12 Minute 14 of the Hearing Panel dated 24 August 2026.

13 Statement of Evidence of Philip Wallace (Hearing Stream Five) dated 5 August 2026 at [1] and [18]–[20], which concludes that the earthworks have elevated the Site platform above the predicted 1% AEP flood level (RCP 8.5 to 2130).

9. RESPONSE TO RELIEF SOUGHT BY THE RESIDENTS' SOCIETY AND OTHER SUBMITTERS

Waste Transfer Stations at Benmore Site and/or within 500m of Residential Zones

9.1 A number of submissions sought that a Waste Transfer Station is not permitted at the Site or within 500m of a residential zone. In this respect I note that Mr Osborne's assessment in his Section 42A Report[14] is that regardless of the current resource consent application by WM, the Proposed Plan should make provision for such an activity as a discretionary activity.

9.2 However, I agree with Ms Goodwin that the Proposed Plan should be more enabling of a resource recovery park in the proposed precinct, while also ensuring the activity is subject to assessment of the relevant anticipated potential effects[15]. To that end, Ms Goodwin recommends that the Benmore Crescent precinct provisions include a rule for resource recovery parks and waste management facilities to be categorised as a restricted discretionary activity.

Retention of General Rural Zoning

9.3 A number of individual submissions seek that the General Rural zoning from the Operative District Plan is retained for the Proposed Plan.

9.4 The merits of whether the Site should be zoned General Industrial versus General Rural have been explored by Mr Osborne in the Section 42A Report and also in the evidence of Ms Goodwin. I concur with their conclusions that the Site should be zoned General Industrial with a precinct to facilitate site specific provisions. General Industrial zoning for the Site is appropriate as it fulfils the direction of the NPS-UD and best provides for resource management in the Wellington Region.

Other Zoning Submissions

9.5 Some submissions seek that the Site is zoned as residential or mixed use or other split zoning options. Based on the evidence of Ms McRae, these alternative zoning options would not retain an open character of the Site that

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14 Section 42A Report at [190].

15 Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 27 October 2026 at [1.6] and [4.9].

the submissions are seeking. That is, the other zone options would still result in development of the Site but of a different character.

9.6 As I outline above, the development agreement with NZTA restricts certain uses of the Site. In particular, sensitive activities and retail activities are restricted. Therefore, these other zoning options are not viable for the Site.

9.7 Therefore, given the direction under the NPS-UD, I consider that the General Industrial zoning with specific precinct provisions is most appropriate for the Site.

Ngāti Toa Rangatira Special Purpose Submission

9.8 Ngāti Toa Rangatira have sought a Special Purpose Industrial Zone, which was generally supported by TKL.

9.9 I understand that the evidence of Dr McClean now agrees with the recommendations in the Section 42A Report for General Industrial zoning with specific precinct provisions.

9.10 However, TKL would support a Special Purpose Industrial Zone as an alternative to General Industrial zoning with specific precinct provisions.

10. SECTION 42A REPORT

10.1 I have read the Section 42A Report, which recommends that the Site be zoned General Industrial within a precinct overlay. As I have discussed above, I am in general agreement with the recommendations in the Section 42A Report, with the following exceptions or changes:

(a) The precinct includes a rule for traffic generation of proposed activities at the Site as recommended by Ms Goodwin;

(b) The precinct includes a rule for resource recovery parks and waste management facilities as a restricted discretionary activity;

(c) The precinct includes provisions to manage the following activities to reinforce the intention of the precinct for larger scale industrial activities and to ensure appropriate traffic effects:

(i) Sensitive activities such as:

(aa) Residential activities;

(bb) Retirement villages;

(cc) Care facilities;

(dd) Childcare / kohanga reo / schools;

(ee) Temporary residential accommodation including hostels, motels and hotels.

(ii) Retail activities (except related to a resource recovery park) such as:

(aa) Fast food retail;

(bb) Drive through retail;

(cc) Supermarkets;

(dd) Large format and big box retail

(iii) Service stations;

(iv) Places of assembly;

(v) Extraction activities;

(vi) Brothels;

(vii) Extractive activities such as mining, quarrying and explorative mining;

(viii) Urupā / Cemeteries;

(ix) Forestry;

(x) Licensed and off-licence premises;

(xi) Hospitals, medical centres and community care centres.

10.2 Accordingly, I support the precinct provisions recommended by Ms Goodwin.

Zoning of Rail Corridor

10.3 I also support the Section 42A Report recommendation that the rail corridor adjacent to the Site is zoned as General Industrial.

10.4 The Proposed Plan shows that the rail corridor adjacent to the Site is intended to be zoned as Medium Density Residential, which is the same as for the residential properties on Mary Huse Grove.

10.5 I agree with Mr Osborne's assessment in his Section 42A Report[16] that the section of the rail corridor adjacent to the Site should be zoned as General Industrial. This approach would be similar to rail corridor zoning at Taita.

11. CONCLUSION

11.1 From my analysis above, my recommendation is that the Site should be zoned General Industrial and identified as a precinct area with site specific provisions applying to land use at the property.

11.2 I generally support Mr Osborne's recommendations in the Section 42A Report with the inclusion of additional site-specific provisions within the precinct requirements.

11.3 I support the evidence of Ms Goodwin in respect of the need for additional business capacity within the City, which can be realised by zoning the Site General Industrial. Ms Goodwin has proposed a comprehensive set of provisions for a precinct area at the Site. Those provisions would ensure the Proposed Plan delivers the necessary business land capacity consistent with the overall objectives and policies of the Proposed Plan, while also ensuring that future industrial uses of the Site can be appropriately managed in terms of potential environmental effects on the character of the area, traffic generation and the residential amenity of residents at Mary Huse Grove.

David Gibson
27 October 2026

16 Section 42A Report at [170]-[179].

Attachment 1



NO	REVISION	BY	DATE
A	FIRST ISSUE		

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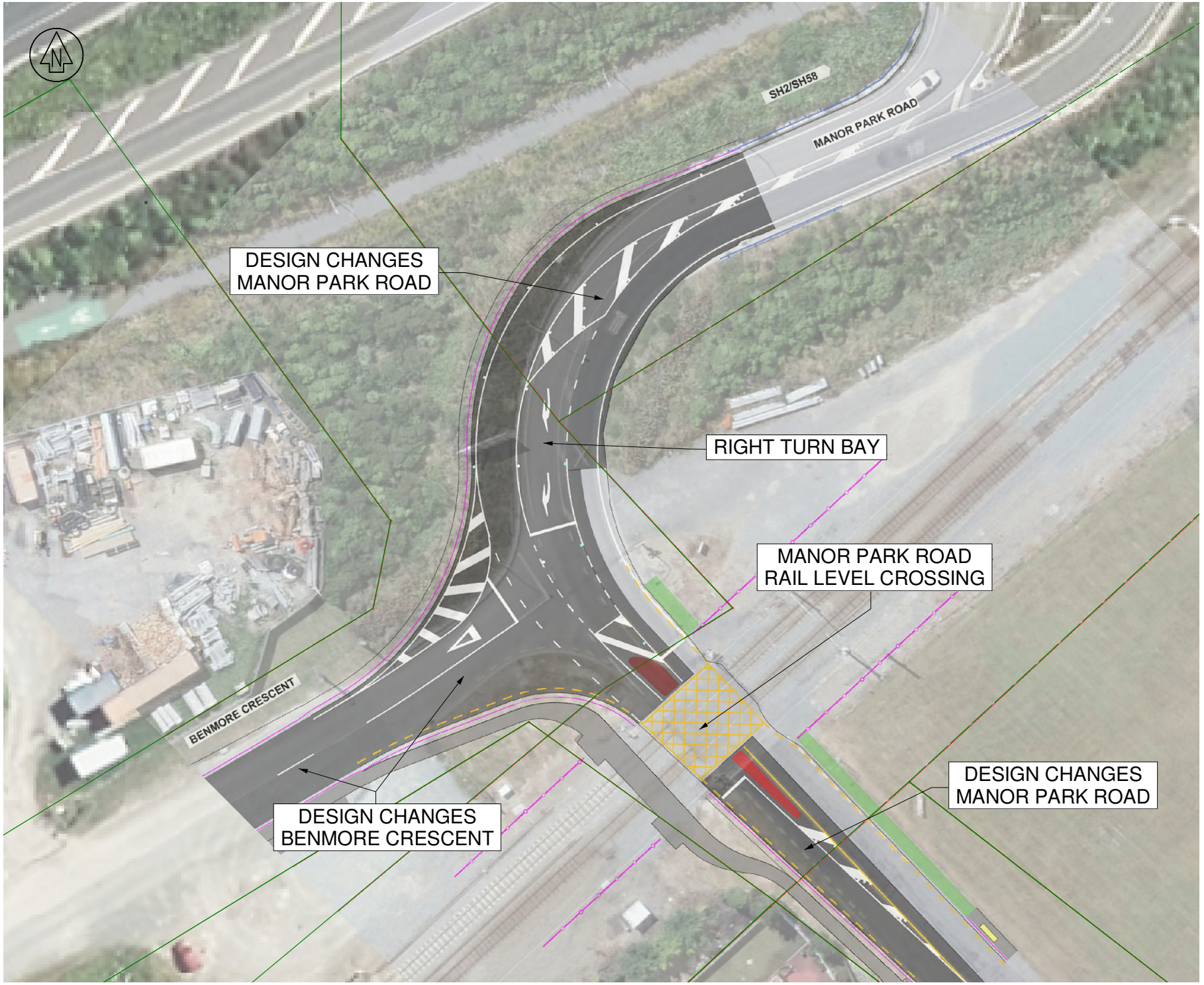
DRAWING NUMBER S20-0380-UAV-10/26
REV A

RESOURCE MANAGEMENT - LAND PLANNING - SURVEYING - STRUCTURAL - CIVIL - FIRE

Attachment 2



NO	REVISION	BY	DATE
A	FIRST ISSUE		

SpencerHolmes
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Level 10 - 57 Willis Street
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CLIENT
TE KAREAREA LTD

PROJECT
30 BENMORE CRES
MANOR PARK

DRAWING TITLE
ROADING UPGRADE
BENMORE PRECINCT
FIGURE 1

DESIGN CONSULTANT
STANTEC

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The Contractor shall verify all dimensions on site.

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S20-0380-D1 Road (Fig1) - PDP01
DRAWN ADG FB
CHECKED ADG DATE 27/10/2026

SCALE 1 : 200
AT A1

DRAWING NUMBER S20-0380-PDP01
REV A

RESOURCE MANAGEMENT - LAND PLANNING - SURVEYING - STRUCTURAL - CIVIL - FIRE