

BEFORE THE HEARING COMMISSIONERS FOR TIMARU DISTRICT COUNCIL (TDC)

UNDER the Resource Management Act 1991

IN THE MATTER of the Proposed Timaru District Plan: Hearing G – Growth; Financial Contributions; Designations

**STATEMENT OF EVIDENCE OF KAAREN ROSSER (PLANNING) ON BEHALF
OF ENVIRO NZ (FORMERLY ENVIROWASTE SERVICES LTD)–
SUBMITTER (162)**

23 JUNE 2025

1. Introduction

- 1.1 My full name is Kaaren Adriana Rosser.
- 1.2 I am an Environmental Planner with Enviro NZ Services Limited ("Enviro NZ"), formerly known as EnviroWaste. My qualifications and experience are detailed at Appendix 1.
- 1.3 The following statement is given on behalf of Enviro NZ in relation to the Proposed Timaru District Plan: Growth; Financial Contributions; Designations. Within my evidence I have addressed matters within the Enviro NZ submission that relate to the designation TDC-22 (Timaru Landfill).
- 1.4 I have reviewed the s42A Hearing Reports ("s42A") completed for the Council by Rachael Williams (Senior Policy Planner), including the recommended responses to submission.
- 1.5 I am familiar with the Timaru District.

2. Landfill Designation TDC-22

- 2.1 The submitter accepts the recommendation of the reporting planner with respect to the rejection of Submission Point 162.18. This submission point requested that Designation TDC-22 (Timaru Landfill) be altered through the RMA process to include the other waste management activities that exist at the site. These refer to the resource recovery activities including the transfer station, the material recovery facility (recycling), and the organics composting facility.
- 2.2 The submission point was to highlight the discrepancy between the landfill designation purpose, its conditions, and all the other waste management facilities on site. It sought, at Paragraph 15 of the submission that the *"designation needs alteration and would like to see the process under s181 of the RMA be undertaken in the near future to update the designation to include the other existing waste recovery facilities on the site"*.
- 2.3 The submitter therefore did not anticipate that the designation be changed through the proposed plan process, and agrees that altering the designation through a Notice of Requirement (NOR) process is required.
- 2.4 In my view, altering the designation (through an NOR process) to include the existing activities on the site would be beneficial for Timaru District Council in order to manage these resource recovery activities efficiently. It will, more importantly, provide greater flexibility to enable diversification of the existing facilities to meet emissions reduction goals. If more products can be recovered, achieving a circular economy is more likely.
- 2.5 I refer to my evidence provided for Hearing A (attached at **Appendix 2**) which gave the legislative background for waste and achieving a circular economy. While I note that the Waste Strategy (Ministry for the Environment. 2023. Te rautaki para | Waste Strategy) has been replaced by the Waste and Resource Efficiency Strategy (2024), the goals are the same in increasing the reuse and recycling of materials and products.

- 2.6 The government is currently consulting on a package of reforms including amending national direction instruments, and providing a new National Policy Statement (NPS) for infrastructure.
- 2.7 The proposed Infrastructure NPS defines Additional Infrastructure as including "*district or regional resource recovery or waste disposal facilities*". If the definition remains in the final version of the NPS, this redefines the landfill site as 'infrastructure', and provides impetus for Timaru District Council to give effect to the NPS. Consideration of Policy 4 will be required where the efficient and timely delivery of infrastructure activities is enabled and the flexibility for new methods to be employed to deliver services.
- 2.8 The submitter therefore, while accepting the rejection of the submission point, requests that Timaru District Council look at altering the designation via the NOR process to better enable future waste reduction goals.
- 2.9 Thank you for your consideration.

Kaaren Rosser
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Appendix 1

Qualifications and Experience

I hold a Bachelor of Science (Earth Sciences) from the University of Waikato and a Post-Graduate Diploma in Natural Resources from the University of Canterbury, along with a Certificate of Proficiency in Planning from the University of Auckland. I am an Associate Member of the New Zealand Planning Institute.

I have over 20 years' experience, which includes both working in local government and the private sector. I have undertaken policy analysis and the preparation of submissions for a wide range of clients as a consultant planner and I have also written precinct provisions for the Auckland Unitary Plan. I have advised clients on a wide range of planning matters, but with a particular focus on water and air discharge matters relating to industrial sites. I have also processed complex planning applications for Auckland Council including chicken farms and large multi-unit developments.

I currently specialise in waste management sites and processes, undertaking consenting and policy analysis for this specialised sector.

Appendix 2

Evidence OF Kaaren Rosser (Planning) On Behalf Of Enviro Nz (Formerly Envirowaste Services Ltd)– Submitter (162) for Hearing A

BEFORE THE HEARING COMMISSIONERS FOR TIMARU DISTRICT COUNCIL (TDC)

UNDER the Resource Management Act 1991

IN THE MATTER of the Proposed Timaru District Plan: Hearing A - Overarching Matters,
Part 1 and Strategic Directions

**STATEMENT OF EVIDENCE OF KAAREN ROSSER (PLANNING) ON BEHALF
OF ENVIRO NZ (FORMERLY ENVIROWASTE SERVICES LTD)–
SUBMITTER (162)**

22 APRIL 2024

1. Introduction

- 1.1 My full name is Kaaren Adriana Rosser.
- 1.2 I am an Environmental Planner with Enviro NZ Services Limited ("Enviro NZ"), formerly known as EnviroWaste. My qualifications and experience are detailed at Appendix 1.
- 1.3 My evidence is given on behalf of Enviro NZ in relation to the Proposed Timaru District Plan: Overarching Matters, Part 1 and Strategic Directions. Within my evidence I have addressed those matters of the Enviro NZ submission that relate to the Description of the District chapter, along with the Strategic Directions and Urban Form and Development chapters.
- 1.4 I have reviewed the s42A Hearing Reports ("s42A") completed for the Council by Alanna Hollier (Senior Policy Planner) and Andrew Willis, including the recommended responses to submission. I have also reviewed the S32 Report, and the Summary of Submissions document.
- 1.5 I am familiar with the Timaru District.

2. Scope of Evidence

- 2.1 This statement of evidence will, in the context of Enviro NZ's submission, address the following matters:
 - (a) The background and reasons for the submission
 - (b) Comment on the Part 1-Introduction and General Definitions and the Strategic Directions and Urban Form and Development Chapters Hearing reports with reference to the Enviro NZ submission.

3. Background and Reasons for Submission

- 3.1 Enviro NZ Services Limited (formerly EnviroWaste and referred to as such herein) is the second-largest solid and liquid waste management company in New Zealand.
- 3.2 Enviro NZ owns and/or operates significant portions of the Country's waste management infrastructure including landfills, waste treatment facilities, recycling facilities and waste transfer facilities. Enviro NZ also provides waste and recycling collection services for Councils, businesses and households throughout New Zealand.
- 3.3 Enviro NZ operates the Redruth landfill site at 23 Shaw Street, and 55A-55C Redruth Street, Timaru on behalf of Timaru District Council. The site comprises a Class 1 landfill, along with a refuse transfer station, a materials recovery facility (MRF), an organics composting facility, and a regional office. The refuse transfer station handles material received from kerbside collections, commercial waste and household waste from the public. The MRF processes kerbside recyclable materials from within and beyond the District. The organics facility processes green waste and food waste into compost using a Gore cover and aeration system, with an Engineered Compost System (ECS) currently being built.

- 3.4 The Redruth site is located 2.6km south of the Timaru Town Centre. The site is designated under the Operative Plan (Designation 69) for landfill purposes, with the designating authority being Timaru District Council.
- 3.5 The landfill is surrounded by land zoned 'Industrial H' under the operative Timaru District Plan to the immediate west of the site. Further west is 'Industrial L' zoned land (refer to zoning map at **Figure 1**). A 'Residential 1' pocket of land is located to the north west and Redruth Park and the Timaru Dog Park is located to the north. Saltwater Creek runs along the eastern and southern boundary of the site. A major trunk railway line runs between this creek and the coastline further west.

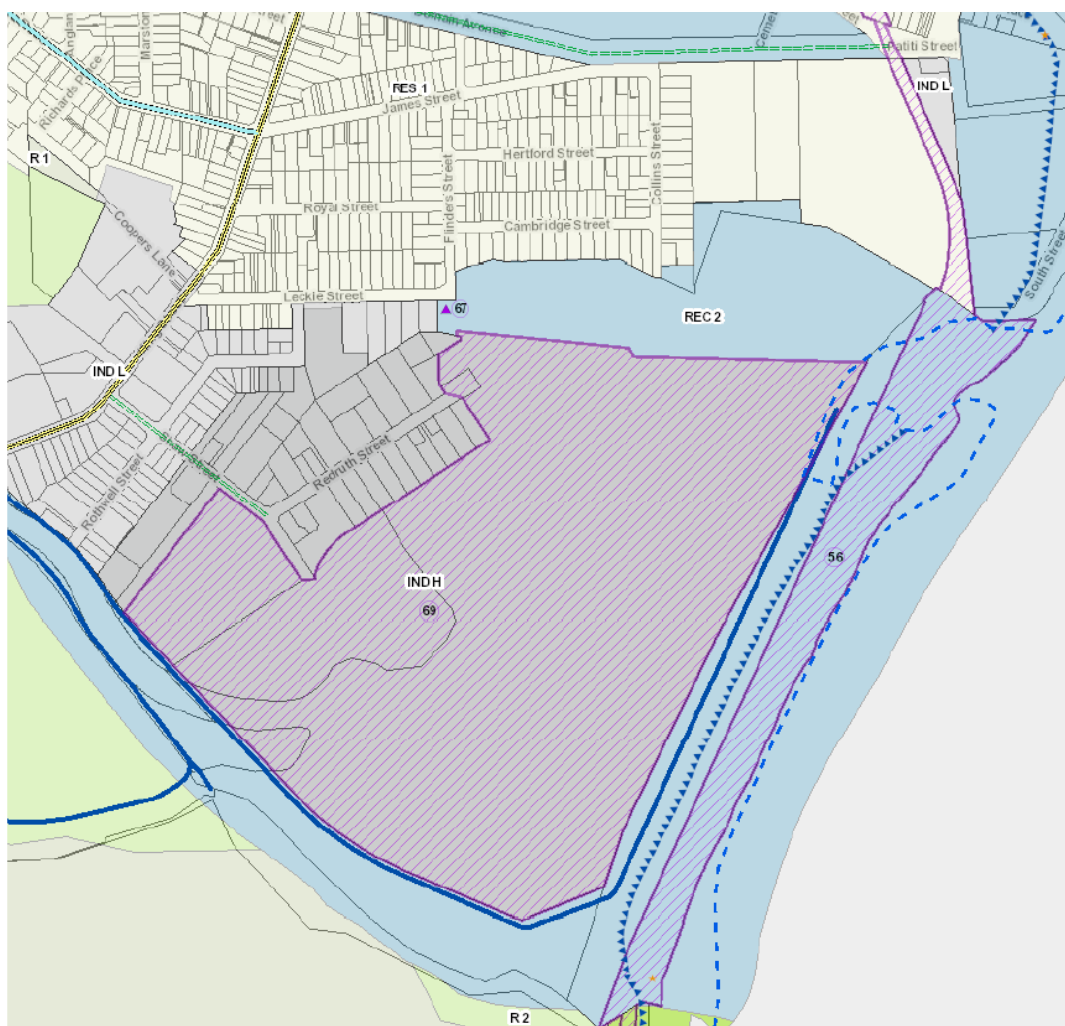


Figure 1: Zoning map for Redruth and surrounds under the operative District Plan

- 3.6 Under the Proposed Timaru District Plan, the site is zoned General Industrial, as well as the surrounding industrial area. The site is designated as TDC-22 for landfill purposes. The designating authority is Timaru District Council. The proposed zoning map is shown at **Figure 2**.
- 3.7 The Redruth site operates under a suite of regional consents to ensure that its design, management and operation adequately protects the environment. These consents have significant compliance and monitoring conditions which include remedial measures to mitigate any adverse effects in the unlikely event of adverse events being felt beyond the boundary. This mostly takes the form of odour

emissions, but also includes effects of dust, litter, and stormwater and groundwater contamination.

- 3.8 These consents demonstrate that waste facilities can take significant resources to design, consent and construct to ensure that potential harmful effects of odour, dust, contamination, and noise do not affect surrounding sites or freshwater resources. Such sites are often the subject of reverse sensitivity.

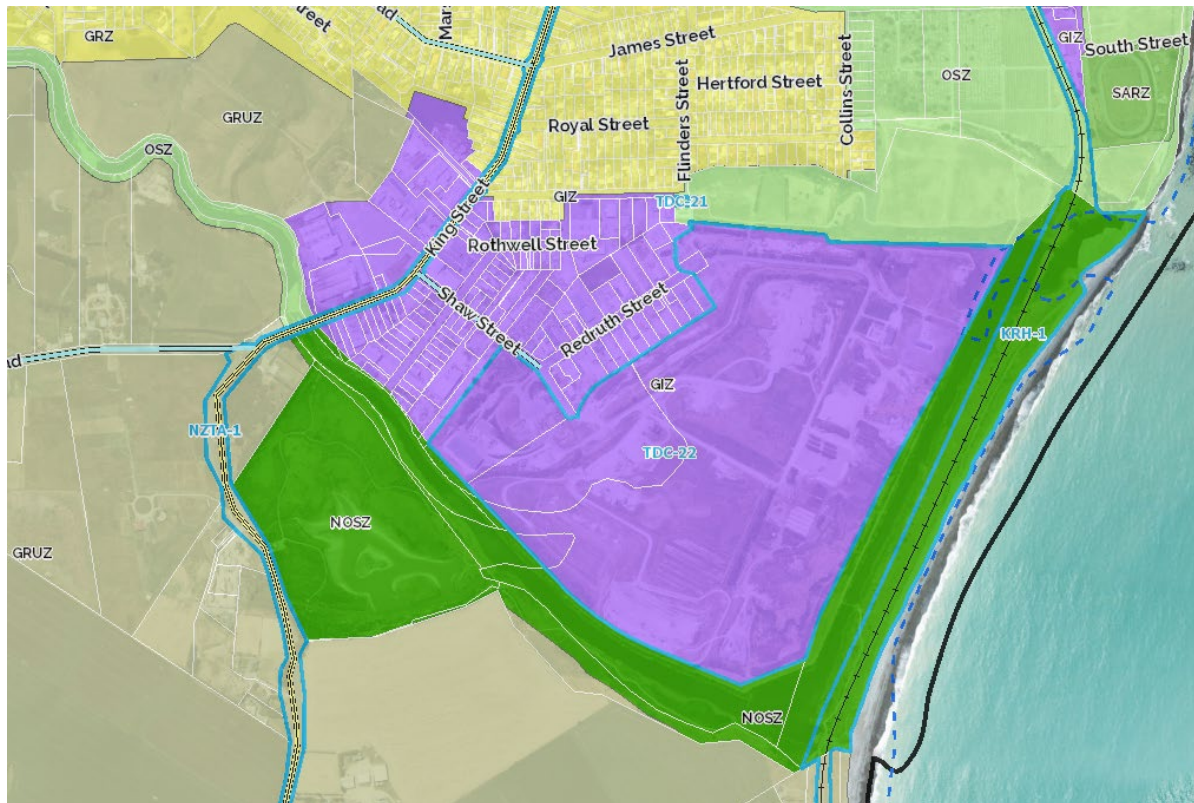


Figure 2: Proposed District Plan zoning

- 3.9 The national approach with regards to waste is now focussed on shifting NZ to a circular economy. This direction is the result of both The New Zealand Infrastructure Strategy (Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy (NZ Infrastructure Commission)) and Waste Strategy (Ministry for the Environment. 2023. Te rautaki para | Waste Strategy) These strategies refer to how NZ can achieve these goals. Goal 2 of the Waste Strategy (page 32) is as follows:

Goal 2: Infrastructure

A comprehensive national network of facilities supports the collection and circular management of products and materials.

- 3.10 It then states that to achieve Goal 2 by 2030 we must focus on the following priorities:
2.2 Ensure planning laws and systems recognise waste management services and facilities as essential infrastructure and a development need.
- 3.11 The continued operation and future diversification of waste management facilities is therefore necessary to achieve a circular economy. I concur with the Waste Strategy that District Plans have a key part to play in enabling and maintaining waste resource recovery and infrastructure.

- 3.12 Diversification is also required in order to meet climate change directives. The way that waste is generated and disposed of in New Zealand needs to be addressed to minimise greenhouse gas emissions and to be more sustainable with the resource that is currently being disposed of.
- 3.13 The Emissions Reduction Plan (May 2022) is required by the Climate Change Response Act 2002. As waste plays a major role in climate change, this document is relevant to consideration of waste in the strategic objectives and policies for the district.
- 3.14 This plan details at p34 that *'Local government makes decisions in many sectors that will need to transition. Councils provide local infrastructure and public services, such as roading and transport, three waters, kerbside collections and waste management, building consenting and compliance, and flood and coastal hazard management.'*
- 3.15 Against this context, the provision of an effective and efficient waste management system is a vital component to any town or district, which ensures the safe and effective operation of any quality built or well-functioning urban environment as directed by the National Policy Statement on Urban Development.

4.0 Introduction and General Provisions – Description of District

- 4.1 The submission from Enviro NZ (Submission point 162.1) sought to add wording to the infrastructure section of the introduction to include the Redruth landfill and resource recovery facilities as regionally significant infrastructure. While I accept that the consideration of the Redruth facilities as regionally significant infrastructure can be discussed at the Infrastructure chapter hearing, I would like confirmation that the rejection of the submission point is indeed interim, as the submission point also has implications on the Strategic Directions chapter discussed below.

5.0 Strategic Direction Chapter – Reverse Sensitivity

- 5.1 Enviro NZ seeks to add to Objective SD-O8 with the addition of words that protect regionally significant infrastructure from *'reverse sensitivity'*, and that if the Redruth facilities are not accepted as regionally significant infrastructure, then the addition of waste facilities within the objective would allow this type of infrastructure to be acknowledged for their importance to the District, and ensure that waste facilities are considered in the strategic objectives and policies where other infrastructure is mentioned.
- 5.2 I do not entirely accept the inclusion as recommended in the S42A report for reverse sensitivity effects. This amendment should enable protection from reverse sensitivity effects rather than management of reverse sensitivity effects, as part of management of adverse effects.
- 5.3 The Redruth landfill and resource recovery facilities are a regional waste facility. In my view they are of critical or strategic importance to the function of the Timaru District. Lack of access to a landfill and resource recovery facilities, would have a serious adverse effect on the social or economic wellbeing of the Timaru area. The function and growth of Timaru cannot be supported if there is no infrastructure in place to deal with waste generated. It is my opinion that significant waste

infrastructure should have protection in the District Plan for its operation and protection from reverse sensitivity. In the case of a landfill, waste diversion will prolong the life of these necessary facilities.

- 5.4 Reverse sensitivity with respect to landfills is suitably managed by making sure that incompatible land uses are not located in close proximity. Incompatible land uses are generally those land uses sensitive to air discharges. While separation may be easier to achieve when the landfill was constructed, given that the location of the landfill would have been based on significant separation to sensitive land uses, as time goes on urban intensification encroaches closer to the landfill and the effects of reverse sensitivity are seen with complaints about its operation and odour. Examples of this are well known at the Redvale landfill in Auckland and the Spicer Landfill in Porirua. Reliance on District Plan provisions to avoid or manage this encroachment is therefore vital to recognise its regional importance.
- 5.5 I note that the s42A recommendations include that '*new residential areas and activities avoid creating significant conflict with incompatible zones and activities*', as an addition to SD-O1. This acknowledges that reverse sensitivity can be problematic.
- 5.6 However, as noted above (and putting aside the fact that the request to consider the Redruth waste management facilities as regionally significant infrastructure will not be considered till a later hearing), I consider regionally significant infrastructure needs protection from reverse sensitivity given its importance. I therefore suggest an alternative amendment to the Infrastructure Objective to account for this:

4. the benefits of regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and upgrading and development is enabled while managing adverse effects, including protection from reverse sensitivity effects, appropriately.

6.0 Strategic Directions Chapter – Waste Management Facilities

- 6.1 The s42A report dismisses waste services as not being the focus of SD-O8, thereby not considering it as infrastructure, if they are not defined as regionally significant infrastructure as requested. I consider that waste management facilities are a form of infrastructure and particularly as a form of social or community infrastructure, even if they are not defined as regionally significant infrastructure.
- 6.2 Drawing on the wider planning framework (including central government strategic planning documents for waste management and infrastructure generally), waste management facilities are recognised in these documents as a form of infrastructure.
- 6.3 I would firstly like to draw to the Panel's attention that while waste management facilities are not defined as infrastructure under the RMA (noting that the repealed Natural and Built Environment Act defined 'district or regional resource recovery or waste disposal facilities' as infrastructure) they can still be considered as infrastructure in the broader meaning of the term and in consideration of the RMA where Section 2(1) states that interpretation of terms are "*in this Act, unless the context otherwise requires*".
- 6.4 The District Plan must give effect to the National Policy Statement on Urban Development 2020 ("NPSUD"). Under NPSUD, **additional infrastructure** is defined (s1.4(1)(b)) as including **community infrastructure**, which is defined in

s197 of the Local Government Act 2002. In this act, community infrastructure is defined as:

- (a) means land, or development assets on land, owned or controlled by the territorial authority for the purpose of providing public amenities; and*
- (b) includes land that the territorial authority will acquire for that purpose.*

- 6.5 In my opinion, the Redruth waste management facilities provide public amenity and so, as the Redruth site is owned and controlled by Timaru District Council (Designation TDC-22), then they qualify as **community infrastructure** under the NPSUD, and therefore under the umbrella of **additional infrastructure**.
- 6.6 Objectives 1, 6 and 8 of the NPSUD are considered to have particular relevance in the context of the Redruth waste management facilities.
- 6.7 There are also a number of government strategies that support the inclusion of waste management facilities as infrastructure. Preparation of a District Plan shall have regard to these strategies under Section 74(2)(b) of the RMA.
- 6.8 The Panel may have regard to Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy (Te Waihanganga o Aotearoa Infrastructure Commission).
- 6.9 I have provided a link to this strategy: <https://media.umbraco.io/te-waihanganga-30-year-strategy/mmahiykn/rautaki-hanganga-o-aotearoa-new-zealand-infrastructure-strategy.pdf>
- 6.10 I note that the strategy¹ defines infrastructure. The strategy notes that Infrastructure can be categorised in many ways. *'One way is to think of it in terms of economic and social infrastructure and the natural environment'* (refer to Figure 2 on Page 19). Economic infrastructure is defined as *'our energy, telecommunications, transport, waste and water infrastructure.'*
- 6.11 The strategy² notes that *'We often think of infrastructure in terms of sectors, like transport, water, electricity, telecommunications, health, education and waste.'*
- 6.12 Table 1³ at Figure 3 identifies waste as infrastructure.
- 6.13 I note that one of the five objectives is⁴: *"Moving to a circular economy by setting a national direction for waste, managing pressure on landfills and waste-recovery infrastructure and developing a framework for the operation of waste-to-energy infrastructure."*

¹ Page 19 – Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy

² Page 20 – Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy

³ Page 34 – Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy

⁴ Page 10 – Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy

Table 1: Examples of better use of existing infrastructure

Category	Health and education	Transport	Waste	Energy	Water
Design	Primary and preventative care Digitalisation of health services	Build houses close to work and amenity Integrated traffic and parking management	Product stewardship to reduce waste Second-hand stores	Energy efficiency measures (home insulation, double glazing) Generation close to load, including distributed energy resources	Reducing network leakage Rainwater harvesting
Educate	Health warnings on cigarette packages	Real-time information on travel speeds	Education to reduce recycling contamination	Energy efficiency technology demonstrations to the business sector (conducted by EECA)	Behaviour change programmes to encourage conservation
Regulate	Covid-19 elimination strategy Speed limits and road policing	Convert parking to public transit Low emission zones in city centres	Banning hard to recycle products	Information disclosure regulations regarding generation "fuel" stocks	Water performance standards for appliances
Price	Cigarette tax	Congestion charging Discounted off-peak public transport fares	Increase waste levy	Real time spot market pricing Discounted off-peak pricing by electricity distributors	Volumetric water charging

Figure 3: Table 1 from the NZ Infrastructure Strategy

- 6.14 Section 6.58⁵ of the strategy includes a number of recommendations with regards to waste. Section 6.5.1 notes that:
"All this waste requires infrastructure like landfills, transfer stations and recycling centres. Reducing the amount of waste we create can also reduce the number of these facilities that we need to build".
- 6.15 The **Waste Strategy** also defines waste management facilities as infrastructure, where one of the key actions⁶ is to *'Make sure that planning and consenting processes take account of the need for waste management infrastructure and services'*.
- 6.16 I consider that given the prominence that waste management facilities are given in the Infrastructure Strategy, the Emissions Reduction Plan, and particularly Priority 2 of the Waste Strategy which states *'ensuring planning laws and systems recognise waste management services and facilities as essential infrastructure and a development need'*, waste management infrastructure should be given suitable prominence in the Strategic Directions chapter.
- 6.17 Accordingly, as the whole objective SD-O8 refers to infrastructure, and Mr Willis accepts that infrastructure has a broad nature, then other types of infrastructure should be recognised in the objective. I therefore consider that including the term

⁵ Page 98 – Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy

⁶ Refer to Page 11 of Te rautaki para | Waste strategy

'additional infrastructure' in the objective will allow waste infrastructure and other infrastructure to be encompassed by the objective, therefore giving the support of the higher order strategic framework for both establishment of this type of infrastructure and its ongoing operation. The proposed amendment encompasses the wording provided in the submission but removes waste services and adds additional infrastructure. Providing this sentence as an additional clause in the objective will not conflate its meaning with regionally significant infrastructure but apply to infrastructure in general.

4. *the benefits of regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and upgrading and development is enabled while managing adverse effects, including protection from reverse sensitivity effects, appropriately.*
5. *Development is serviced by an appropriate level of infrastructure, including additional infrastructure that effectively meets the needs of that development.*

7.0 Conclusion

- 7.1 By way of summary, it is my opinion that the changes sought by Enviro NZ to Introduction and the Strategic Directions Chapter as detailed in the evidence respond to the importance of the Redruth site as a regional waste management facility and should be adopted by the Hearings Commissioners.
- 7.2 Notwithstanding that the submission point to consider the Redruth facility as regionally significant infrastructure will not be until a later hearing, in my opinion regionally significant infrastructure needs to be protected from reverse sensitivity. The proposed wording provides a stronger basis for subsequent objectives and policies that provide for development to be avoided that constrains the operation of the regionally significant infrastructure.
- 7.3 The wider planning framework context requires that the objectives and policies of the Strategic Direction Chapter be applied in a way that is inclusive of waste management facilities as a form of additional infrastructure. Therefore, ensuring that these facilities are afforded the support of the higher order strategic framework will accord with these policy statements and strategies.
- 7.4 I consider the proposed addition to SD-O8 is appropriate and will recognise waste management facilities in the broader meaning of infrastructure, regardless of whether they are defined as significant regional infrastructure.
- 7.5 Thank you for your consideration.

Kaaren Rosser
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Appendix 1

Qualifications and Experience

I hold a Bachelor of Science (Earth Sciences) from the University of Waikato and a Post-Graduate Diploma in Natural Resources from the University of Canterbury, along with a Certificate of Proficiency in Planning from the University of Auckland. I am an Associate Member of the New Zealand Planning Institute.

I have over 20 years' experience, which includes both working in local government and the private sector. I have undertaken policy analysis and the preparation of submissions for a wide range of clients as a consultant planner and I have also written precinct provisions for the Auckland Unitary Plan. I have advised clients on a wide range of planning matters, but with a particular focus on water and air discharge matters relating to industrial sites. I have also processed complex planning applications for Auckland Council including chicken farms and large multi-unit developments.

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