

18 December 2023

Terra Consultants
PO Box 50-28
Frankton
HAMILTON 3242
Attn: Richard Falconer
richard.falconer@terragroup.co.nz

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Dear Richard,

Resource Consent Application – Further information request and Process Matters

Application number: LU/0323/21
Applicant: Global Contracting Solutions Limited
Address: 401 Racecourse Road, Te Awamutu

We have now completed a review of submissions which has been quite an extensive exercise given that there are over 800 submissions lodged to the district council application.

This letter sets out matters arising from the submissions review process and identifies further matters which we consider will need to be addressed as part of a S.92 process.

1. Submissions Summary

Given the substantial number of submissions, you have requested whether we would be able to release material from the summary to assist the applicant's process and understanding of matters arising from submissions.

At this stage we have a working draft document which is intended to form part of any S.42A report. This will need a reasonable amount of additional work to complete the document if it is intended to be issued as a formal summary document by Waipa District Council. If this is required by the applicant now, then we consider it will also need to be issued to all parties and placed on Council's website.

Given the recent decision of WRC to request a call-in, can you please confirm if you wish us to progress a summary document?

2. Further Information requests

There are a number of matters arising from the submissions which we consider should be subject to a further Section 92 request for additional information/reporting. In our view, the opportunity for these matters to be addressed by the applicant will assist with the hearings process and the assessment and decision making on the application.

Can you please provide the following;

(1) Cultural Impact Assessment (CIA)

A number of submissions raise concerns about the lack of a CIA notwithstanding that there was some earlier correspondence from Waikato-Tainui . Given the matters raised within the submission regarding a lack of consultation and the actual and potential effects on cultural values, we request the applicant to engage with mana whenua and to provide a CIA. The findings of any CIA should also help to inform the cultural elements and assessment of landscape values and connections.

In addition to the above, we understand that your client has already commenced the process to obtain a CIA.

Can you please confirm provide a CIA and also advise the likely timetable to have the CIA completed?

(2) Social Impact Assessment (SIA)

While there are a number of issues arising from the submissions which will be addressed by technical and expert evidence, it is also apparent that the nature, location and potential effects of the WtE facility are likely to have social effects on the local community notwithstanding. These effects which are raised in multiple submissions include;

- A reputational risk to Te Awamutu that it may lose its 'Rose Town' association and that it will suffer from the stigma of being the town hosting a WtE facility. This may affect

the desirability of Te Awamutu as a place to live and will be detrimental to community well-being over the long term,

- Decisions by families to choose alternate pre-school and education options to avoid having their children attending educational facilities in close proximity to the site and within harms ways of any emissions,
- Potential changes to the socio-economic make up of families and residential development around the site as this area becomes an undesirable place to live, and
- How any facility may impact on the mental and social well-being of the community, particularly for residents, in close proximity to the site who retain concerns about the nature and potential health effects of any emissions and discharges, notwithstanding any final technical assessment and decision on the application.

We also note that the MfE guidelines 'A waste to energy guide for New Zealand' (Info 964 - August 2020) provides *Principle 4* around community support of a series of questions for WtE proposals with number 21 as follows:

Community support

21. Has a full socio-economic impact assessment been carried out, to understand the potential effects for those living near the proposed plant, in terms of health and well-being, environmental and economic effects?

Given the above matters, a social impact assessment is requested to inform the assessment of effects. We also suggest that there would be benefit in reaching an agreed scope of the social impact assessment before this is commissioned.

(3) Transportation Assessment

We note that transportation effects have been raised in a number of submissions. In addition, Waka Kotahi has raised several specific points in relation to the traffic impacts on the SH3/Racecourse Road intersection, including peak vehicle volumes, sight distances, effects on pedestrians and cyclists and vehicle tracking. The Ministry of Education has also requested further confirmation of traffic routes and methods to manage traffic movements.

We consider there would be merit in the applicant providing an addendum to the Transportation Assessment to address the matters raised by Waka Kotahi, the Ministry of Education and the general submissions. It may also be beneficial to arrange a joint meeting with the traffic specialists to go through the matters raised.

Can you please confirm that your client will provide additional transportation assessment and whether you consider there is merit in arranging a meeting with the transport specialist?

(4) Operational matters

There have been a number of issues raised in the submissions regarding the management and operational requirements of the facility and the incineration process. These matters are largely being addressed by the regional council, however, there may be some overlap and issues arising in terms of land use matters. While we do not wish to duplicate S.92 request and workload, it will be important to ensure that there is a clear alignment in terms of the operation of the facility and the respective assessments of both consent authorities.

We therefore request clarification of the following matters which we understand will also be required for the regional council assessment:

- (a) Please confirm whether tyres will be stored on site, and if so:
 - whether these will be whole tyres or shredded tyres
 - the maximum volumes/tonnes of tyre material to be stored onsite, and where these will be stored
- (b) How the risk of fires within the tyre storage area will be managed?
- (c) Please provide an estimate of the daily average and maximum generation rates (volumes and tonnage) of grate ash, fly ash, boiler ash and filter ash, and the maximum storage provided for these ash byproducts in the energy plant building. Please also confirm that there will be no storage of ash outside the building, and no drying of the wet grate ash.
- (d) Please confirm the volumes of hazardous substances to be stored on the site (eg diesel).

(5) Waikato Thoroughbred Racing Incorporated (WTR) Submission Transportation Assessment

WTR is an adjacent landowner and has lodged a submission raising a number of concerns with the proposed WtE facility and effects on both equine activities and also in terms of future residential development. These concerns include;

- Visual effects and simulation of proposed building and site development which are not considered representative of effects on nearby residential development,
- Gaps/omissions in the noise assessment,
- Potential for odour given variables within feedstock and emissions process,
- Assessment of light sources and emission given the 24/7 nature of operation, and
- Construction effects on equine activities.

Given the location of the WTR site adjacent to the site, and the direct interface of actual and potential effects on both existing and future activities, please provide further information and assessment on the submission points.

(6) Heritage New Zealand Pouhere Taonga Submission

Heritage New Zealand Pouhere Taonga supports in part only the proposed activities subject to the appropriate ongoing management of historic heritage. There are no recorded archaeological sites on the property, however Heritage New Zealand Pouhere Taonga has advised that it would be prudent for the application to be placed on hold to allow the applicant to obtain an archaeological assessment.

Can you please advise whether these authorities will be applied for prior to any hearing on the land use application?

(7) Proposed Conditions

To help understand the nature of effects and how these are proposed to be mitigated, it is requested that the applicant provides a full set of conditions for the land use consent. If the conditions refer to management plans, then either a draft management plan should be submitted or the framework of contents for the management plan will need to be clearly articulated to enable certainty as to the scope and methods to be adopted. Please note, I have not formed an opinion as to my recommendation, the request for draft conditions is intended to assist with understanding possible mitigation measures.

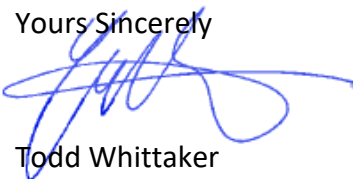
3. Next Steps

It is recommended that we have a project meeting to discuss the further information requests and the timetable for how and when these will be addressed. This should also address the S.92 matters set out in our letter of 11 October 2023.

We acknowledge that the applicant has the right to refuse a S.92 request in accordance with S.92A. This may have an influence on any S.104 assessment in accordance with sub-clause S.104(7).

Please call or email me on 021 676 377 or todd@planningworks.co.nz if you would like to discuss this letter.

Yours Sincerely



Todd Whittaker
Consultant Planner

Cc: Rachael O-Donnell, WRC