

4 March 2022

Terra Consultants  
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**Digitally Delivered**

Dear Chris

### **Resource Consent Application – Further information request**

**Application number:** LU/0323/21  
**Applicant:** Global Contracting Solutions Limited  
**Address:** 401 Racecourse Road, Te Awamutu  
**Proposed activity(s):** Construct and operate plant to generate power through combustion of refuse derived fuel

In accordance with section 92 of the Resource Management Act 1991, further information is requested to enable an accurate and informed assessment to be undertaken. The following information is requested:

#### **1. General Matters**

1.1. Please provide visual montages / renders that show the proposed built form in relation to the neighbouring context and landscape. Suggested key locations for visual montages include views to the proposal from the neighbouring Racecourse land to the north, and the more elevated properties north of the Racecourse (such as the views shown in Figures 57 -59 of the application report), together with views of the proposal from the High School fields and Te Wānanga site on the southern side of Mangapiko Stream.

*Reasons for request: To better understand the likely visual effect of the proposed infringement of up to 18 metres above the 20m maximum building height control that applies in the Industrial Zone*

1.2. There is inconsistency between the application drawings showing the fencing proposed to be established along the northern boundary. The landscaping plan shows a 3.5m high acoustic fence at the entrance end and a 1.8m high aluminium fence along the remainder of the boundary. The acoustic report identifies a 2.5m high acoustic fence reducing to a 1.8m high acoustic fence. Please confirm the height and nature of the proposed fencing along the northern boundary of the site.

*Reasons for request: To confirm the nature of the proposed fencing along the northern boundary of the site.*

- 1.3. The application states that the proposal will comply with the permitted standards for signs in the Residential Zone (which limits signs to no greater than 0.25m<sup>2</sup>). The visuals attached to the report show signage that would appear to exceed this standard. Please confirm compliance, or whether consent is being sought to exceed this District Plan standard.

*Reasons for request: To confirm the reasons for which the proposal requires resource consent.*

## **2. Waste strategies**

Council's Waste Minimisation Officer, Sally Fraser, has requested the following information in order to better understand the proposal:

- 2.1. The Ministry for the Environment's factsheet "A waste to energy guide for New Zealand", provides a series of questions that the Ministry recommends proposals to establish a waste to energy plant should address, available here: <https://environment.govt.nz/assets/Publications/Files/waste-to-energy-guide-for-new-zealand.pdf>. Please provide an assessment of the proposal against each of the questions listed in the Ministry's fact sheet.
- 2.2. Please provide an assessment of the proposal in terms of its alignment with achieving Council's Waste Management and Minimisation Plan 2017-2023 prepared under the Waste Minimisation Act 2008, available here: <https://www.waipadc.govt.nz/our-council/strategy-and-planning/wastemanagement>

*Reasons for requests 2.1 – 2.2: To better understand the extent to which the proposal aligns with Ministry guidance for this type of facility, and with Council's waste management plans prepared under the Waste Minimisation Act 2008.*

## **3. Cultural effects**

The application has been referred to Waipā District Council's iwi representative forum, Ngā Iwi Tōpū O Waipā (NITOW). Further to the meeting on-site with NITOW representatives, the following information is requested:

- 3.1. Could the applicant provide a presentation on its wastewater discharge plans to NITOW.

*Reasons for request: To understand potential cultural effects associate with the discharge of wastewater.*

## **4. Parks and Reserves**

Council's consultant parks advisor, Anna McElrea of Xyst Ltd, has requested the following information to assist in her review of the proposal:

- 4.1. Please provide a plan showing setbacks of the proposed development from the Mangapiko Stream (highlighting where earthworks within 23m of the stream will occur and demonstrate the areas and depth of earthworks in this area) and the boundary to the T13 Growth Cell.

*Reasons for request: To confirm the extent of works and development proximate to the stream area of future development area.*

- 4.2. Please provide a landscaping plan for the Mangapiko Stream margins prepared by an appropriately qualified ecologist for the proposed restoration of the riparian area that includes a planting and maintenance programme.

*Reasons for request: The application states there is a significant opportunity not shown on the landscaping plan for major restoration of the site's Mangapiko Stream margins and that it is anticipated agreement can be negotiated with Council on the form that landscaping will take along the Stream through the s92 process. I think this major restoration could definitely be a key component of the application's stormwater, visual and environmental mitigation. At a minimum we would be seeking 20m of planting along the entire edge in line with esplanade requirements under the RMA however a wider area would likely address the visual impacts of the proposed development when viewed from the Te Wānanga o Aotearoa site on the southern side of the stream opposite the subject site and Factory Road. This would align well with a number of initiatives underway to restore the mana and the mauri of this awa, such as Council's recently funded long term Mangapiko and Mangaohoi Stream Restoration Project for the esplanade reserves within Te Awamutu's urban boundaries and the Maungatautari to Pirongia Ecological Corridor Project <https://www.landcare.org.nz/current-project-item/m-mangapiko-mai-i-maungatautari-ki-maunga-pirongia-ahu-ake>*

- 4.3. Please outline how you intend to protect and maintain in perpetuity the proposed restoration planting discussed in the point above to ensure it achieves the desired long term visual buffer, stormwater mitigation, landscaping and ecological benefits outlined in the application? Options could include an esplanade strip or a covenant.

*Reasons for request: To better understand the ability for the proposed restoration area to be maintained in perpetuity.*

- 4.4. Can you please provide some commentary around the proposal's compliance with District Plan rule 7.4.2.11?

*Reasons for request: This rule requires industrial development to provide outlook toward and visually connectivity to water bodies and reserve areas. The proposal is described as complying with this rule, but limited opportunity for visual connectivity appears to be provided.*

- 4.5. Can you clarify why the proposed acoustic screen is lower along the Race Course boundary when the adjoining land is likely to be developed as residential housing and as part of this may include public open space such as a neighbourhood reserve?

*Reasons for request: To confirm the effects of the proposal on the amenity of the neighbouring land, and the appropriateness of the mitigation proposed.*

- 4.6. Could you consider further landscaping along the Race Course boundary to ensure the site is sufficiently landscaped and screened to create an appropriate buffer to the adjoining residential zone being the T13 Growth Cell to seek better alignment to District Plan rules 7.4.2.13 and 7.4.2.14?

*Reason for request: To understand the opportunity for landscaping along the common boundary in accordance with these rules.*

- 4.7. Can you please provide plans showing two options for the alignment of the Te Awamutu – Pirongia cycleway through the site that has previously been discussed with the applicant; one alongside the proposed vehicle entrance and one crossing the stream from the Te Wānanga o Aotearoa site. The plans should indicate widths and setbacks from the internal roads, how vehicle crossing points will be managed and how matters such as the impact of the high acoustic screen and the vehicle movements will be mitigated to create a safe and pleasant public cycleway.

*Reasons for request: To understand how this cycleway could be incorporated into this development. It is understood it is the applicant's aspiration to have the walk/cycleway go past the proposed education centre and café.*

## **5. Development engineering**

Council's Senior Development Engineer, Harry Baxter, has identified the following matters as being required to fully assess the effects of the proposal:

### ***Internal accessways***

- 5.1. Please provide further information on the slope angle of the proposed stabilised / reinforced slopes supporting the internal access roads and ramps and detail how the slopes will be designed to support these anticipated loads.

*Reasons for request: To better understand the engineering implications of the proposed accessways and landform.*

### ***Water supply***

- 5.2. The water demand of the proposal is stated as 170m<sup>3</sup>/day in the application, however in meetings with Waipā District Council staff the applicant verbally advised that the proposal would have a daily water usage of 72m<sup>3</sup>/day. Please clarify the water demand for this proposal.
- 5.3. Provide further detail on how demand will typically fluctuate on a daily basis and also at a greater interval if there are fluctuations over a longer timespan (e.g. weekly or seasonally). Information should be provided on measures to mitigate fluctuations in water demand.

- 5.4. Water supply modelling is required to assess the imposed demand on Waipā DC's infrastructure from this proposal. Waipā District Council's Water Services Asset Planning Engineer ([Melissa.Allfrey@waipadc.govt.nz](mailto:Melissa.Allfrey@waipadc.govt.nz)) should be contacted and the results of water supply modelling based on a worst case scenario (e.g. no supplementary rain water available and depleted backup storage) provided in a response to this request.

*Reasons for requests 5.2 – 2.4: To better understand likely demand and potential capacity constraints on the reticulated network.*

### **Wastewater**

- 5.5. The wastewater production from this proposal is stated in the report as 36.7m<sup>3</sup>/day of calcified liquid to be carted away and 120m<sup>3</sup>/day of daily washdown water that is to be sufficiently treated and disposed of to the public reticulated network. Due to the lack of clarity regarding water usage please confirm the daily wastewater that will be produced by this proposal.
- 5.6. Provide information on how the calcified liquid will be settled in the tanks and then carted.
- 5.7. Demonstrate how the proprietary products will ensure that the discharged water from wash area is of acceptable quality for disposal to Waipā District Council's wastewater network.
- 5.8. Wastewater modelling is required to assess the imposed demand on Waipā District Council's infrastructure from this proposal. Waipā District Council's Water Services Asset Planning Engineer ([Melissa.Allfrey@waipadc.govt.nz](mailto:Melissa.Allfrey@waipadc.govt.nz)) should be contacted to organise this and the results based on peak wet weather flow should be provided in a response to this request.

*Reasons for requests 5.5 – 5.8: To better understand how wastewater will be managed and potential implications of the proposal on Council's network.*

### **Stormwater**

- 5.9. Further detail should be provided on the condition of the existing outfalls to the Mangapiko River and as they are above the permanent flow level, information on any upgrades to provide long term protection against erosion should be provided. Alternatively, confirmation should be provided that the outfalls will not accelerate any erosion within the Managapiko River.

*Reasons for request: To better understand potential stormwater effects associated with the existing outfalls.*

### **Built proposal**

- 5.10. Please advise what importance level the buildings, retaining walls and stabilised slopes will be designed to as per Clause A3 of the Building Code.

*Reasons for request: To have clarification of the seismic resilience of structures associated with the proposal in order to understand potential vulnerability to natural hazards.*

## **6. Transportation**

Council's consultant transportation engineer, Naomi McMinn of Gray Matter, has identified the following information as being required to understand the transportation effects of the proposal:

### ***District Plan Requirements***

6.1. The application is supported by a Transportation Assessment Report (TAR), where a Broad Integrated Transportation Assessment (ITA) is required by Rule 16.4.2.22. The Rule states that heavy vehicles are to be taken as 10 car equivalents. The proposal traffic generation is 2,890 car equivalents per day. Additional information is required to meet the Broad ITA checklist set out in Rule 21.2.16.3. The Broad ITA should consider the following matters:

- a) Consideration of other developments, land use and transport network improvements including residential development in the Structure Plan area and planned improvements to pedestrian and cycle connections (Te Awamutu to Pirongia cycleway).
- b) Predicted travel data and 10 year assessment period.
- c) Appraisal of transportation effects including safety, efficiency, environmental, accessibility, integration and economic effects. Sensitivity testing. Pavement impacts (Rule 18.4.2.14) should be considered.
- d) Details of proposed mitigating measures and revised effects, including measures to encourage other modes. Travel planning for staff and visitors. Travel demand management measures and sensitivity testing mitigations.
- e) Detailed assessment against the Waipā District Plan transportation rules and the Waipā Integrated Transport Strategy principles and objectives.
- f) Assessment of effects, conclusion and suitability of the location of the proposal.
- g) Recommendations in the form of proposed conditions.

*Reasons for request: To better understand the proposal's transportation effects, in accordance with the ITA rules of the District Plan.*

### ***Clarification of the existing activity***

6.2. Please confirm the existing site activity and vehicle movements at the vehicle crossing.

*Reasons for request: It's not clear from the TAR what the site is currently being used for or how many vehicle movements are made at the existing at the vehicle crossing.*

### **Clarification of the proposed activity**

6.3. The application states that the northern portion of the site will be unaffected by the proposal, apart from a redirection of access to that part of the site, which is proposed to be served from the access lot identified as Greenhill Road on the Record of Title. Please provide the following information:

- a) Clarify the nature of rights available to the subject site over the access lot, and
- b) Provide an assessment of the safety effects associated with the increase in vehicles utilising the existing crossing taken from a posted 100km/hr speed zone of State Highway 3.

*Reasons for request: To understand potential effects associated with redirecting access to the northern portion of the subject site.*

6.4. Waipā District Council's GIS maps show that the neighbouring land incorporates an accessway that is intertwined with the accessway to the subject site. Refer **Figure 1** below. Please clarify if other sites or activities will be using the proposed vehicle crossing and confirm the total vehicle movements that will use the proposed vehicle crossing.

*Reasons for request: It's not clear how the other sites that appear to have access to the existing vehicle crossing will be serviced.*



**Figure 1:** Council's GIS map showing accessway for the adjoining site (highlighted in red) intertwined with subject site

6.5. Please clarify the proposed activity including operating days and hours:

- a) Days and hours of plant operation
- b) staff shifts (no. staff and hours)
- c) Days and hours of domestic drop offs
- d) Days and hours of commercial drop offs

- e) Days and hours of education centre/exhibition centre open to public
  - f) Days and hours of café open to public
- 6.6. Update the trip generation of the proposed activity including operating hours and days (conflicting information provided in Section 1 and 4 of the TAR). The trip generation needs to consider trips associated with the café/education activities and domestic waste drop offs.

*Reasons for requests 6.5 and 6.6: The proposed activity described in the application is a waste to energy plant with education centre and café. The TAR provides operating hours in Sections 1 and 4. However these are inconsistent. In addition, the TAR has not considered the traffic generation or effects of the education and café activities. The car park layout with three bus spaces implies buses are expected.*

#### **Swept paths and truck turning at vehicle crossing**

- 6.7. Please provide the following information:
- a) Provide right turn out swept paths for the design vehicle.
  - b) Confirm if 0.5m clearances are included in the swept path envelopes.
  - c) Confirm the extent of pavement widening and kerb.

*Reasons for request: Swept paths for trucks turning right out of the site have not been provided and it is not clear if the swept paths include clearances. We are concerned the swept paths do not properly consider the existing kerb on the inside of the curve. The widening of the vehicle crossing will require the existing power pole on the northern corner of the vehicle crossing and overhead electricity services to be relocated.*

- 6.8. Please provide the following information:
- a) Provide further assessment of safety effects arising from trucks turning right into the site on following and opposing vehicles.
  - b) Confirm whether a right turn bay is required to address these effects.

*Reasons for request: The proposal does not include carriageway widening to accommodate a flush median or right turn bay. The effects of the additional trucks sheltering waiting to turn right in to the site have not been considered. Given the lack of visibility around the curve, we are concerned that a waiting truck may not be seen by a southbound driver and could pose a safety risk.*

#### **Sight distance at the vehicle crossing**

- 6.9. Confirm the sight distance to the north for the upgraded vehicle crossing. We have assessed the current sight distance at the existing vehicle crossing provided within the road reserve as approximately 50m.



6.10. Based on operating speed<sup>1</sup> of 60 km/hr the minimum sight distance required is 115m. The TAR states that the available sight distance is 83m to the north. Please provide the following information:

- a) Provide an assessment of effects focusing on safety at the vehicle crossing as a result of the non-compliant sight distance.

*Reasons for requests 6.9 – 6.10: To better understand the safety effects associated vehicle movements and drivers' sight lines.*

### **Effects on the surrounding road network**

6.11. Please provide the following information:

- a) Provide the CAS crash data for the local road intersections and SH3 intersections that have not already been provided in the TAR and an assessment of the potential safety effects of the proposed activity on all road users at:
  - (i) SH3-Racecourse Road,
  - (ii) Mangapiko St-Factory Rd-Racecourse Rd- Tawhiao St,
  - (iii) Mangapiko St-Mutu St,
  - (iv) Mutu St-SH3,
  - (v) Tawhiao St- Alexandra St,
  - (vi) Mutu St-Alexandra St.

All of the truck traffic is expected to use SH3. *Reasons: The proposal increases truck movements to around 3-4 times the existing number of trucks on Racecourse Road. There is the potential for adverse safety effects on all road users if the potential effects are not adequately considered at the state highway and local road intersections. The TAR has provided CAS data for Racecourse Road / Ohaupo Road (SH3), Racecourse Road / Taylor Avenue and Racecourse Road / Mangapiko Street. We are concerned that local road routes will be attractive to truck drivers traveling to/from the east and south. The TAR has not included approval from Waka Kotahi New Zealand Transport Agency as the Road Controlling Authority for SH3. The applicant is encouraged to consult with Waka Kotahi regarding the proposal, and to provide evidence of that consultation and any written approval to the Council.*

### **Internal parking and circulation layout**

6.12. Please provide a parking assessment including expected car parking demand from all activities (including staff, visitors, buses, exhibition and education centre), duration, and frequency to confirm the expected parking demand can be accommodated on-site.

*Reasons for request: Visitor parking, bus parking and loading spaces appear to be provided on site. The arrangement for where staff will park on-site is not clear.*

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<sup>1</sup> Operating speed = 85th percentile speed, taken as posted speed plus 15%

6.13. Please provide the following information:

- a) Clarify the circulation arrangement for domestic waste drop-offs
- b) Clarify the circulation arrangements for commercial and domestic drop-offs.

*Reasons for request: It is not clear where domestic waste drop-offs will occur or how they will circulate on-site and over the weighbridge.*

### ***Walking and cycling***

6.14. Please provide the following information regarding internal and external connections for walking and cycling:

- a) Provide safe walking and cycling connections from Racecourse Road through the internal car park connecting to the buildings.
- b) Provide details of how the proposal will connect to the existing and planned pedestrian/cycling routes to support staff and visitors traveling to the site by modes other than private car. This should include connections to the proposed Te Awamutu to Pirongia Cycleway.
- c) Confirm the proposed on-site parking and end-of-journey facilities for cyclists (ie. charging points, showers, lockers, covered and secure parking, staff and visitor cycle parking) and locations within the site.

6.15. Given that the proposed crossing is around 25m wide, provide an assessment of safety effects for pedestrians walking to/from the future residential zone.

*Reasons for requests 6.14 and 6.15: To better understand potential safety effects for pedestrians and cyclists associated with the proposal or undertaking journeys through or near to the site.*

### ***Pavement impacts***

6.16. Provide an assessment of effects arising from the heavy vehicle loading on the surrounding local road network.

*Reasons for request: The proposed trucks using the collector and local roads have the potential to damage the pavement. Refer to Rule 18.1.5 and Rule 18.4.2.14 of the District Plan.*

## **7. Environmental Health**

Council's environmental health officer, Glynn Jones, has requested the following information:

- 7.1. Confirmation that there will be no waste handling outside of the building.
- 7.2. Confirmation that the external and internal access doors for trucks tipping waste within the buildings are interlocked, so that one door is always shut.
- 7.3. A draft pest management plan to address potential nuisance effects associated with pests attracted by the waste.

*Reasons for requests 7.1 – 2.3: To better understand potential environmental health nuisance effects and associated mitigation.*

### **Other Matters**

As previously discussed with you, a review of the acoustic report is being undertaken, and any requests for further information that arise from that review will be supplied to you separately.

### **Next Steps**

Within 15 working days from the date of this request you must either:

1. Provide the information requested, or
2. Advise Council in writing of the alternative date that you will provide the information by, or
3. Advise council in writing that you refuse to provide the information requested.

**Please be advised that the statutory timeframes for processing your application have been put on hold until the further information requested has been received.**

When all of the information requested has been provided I will review it to make sure it adequately addresses all of the points of this request. Please note that if council has to seek clarification on matters in the further information you provide, then this will be considered as information required under this letter. As such the application will remain on hold.

If you do not provide, or refuse to provide the information, council is required to notify your application under section 95(C) RMA. If this happens, you will be required to pay the notification fee in full before we proceed with the notification of your application.

Once all the information requested is received and assessed a determination will be made on whether the application will be processed on a notified or non-notified basis.

Please note that if you are dealing directly with other departments in Council in regard to the further information, the further information must still be sent to me.

If you are not sure how to respond, please call me and we can discuss your options.

Yours Sincerely



Aidan Kirkby-McLeod  
**Project Planner**