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Submission on the proposed Waste to Energy Plant in Te Awamutu

Waipā District Council's submission to the Environmental Protection Authority on the application for resource consents by Global Contracting Solutions Limited to construct and operate a Waste to Energy Plant in Te Awamutu.

To:The Environmental Protection Authority

1. This is a submission from Waipā District Council.
2. This is a submission on a matter in relation to which the Minister for the Environment made a direction under Section 142(2) of the Resource Management Act 1991.
3. The matter is the applications by Global Contracting Solutions Limited for resource consents for the construction and operation of a waste to energy plant at 381, 401 and 417 Racecourse Road, Te Awamutu, and specifically:
 - Land Use Consent to permanently operate a waste to energy plant in the Industrial Zone (Specialised Dairy Industrial Area) of the Operative Waipā District Plan; and
 - Discharge of emissions to air associated with operating the plant; and
 - Discharge of stormwater to surface water associated with operating the plant; and
 - Deposition of cleanfill associated with construction of the plant.
4. Waipā District Council would not gain an advantage in trade competition through this submission.
5. This submission relates to the whole of the applications by Global Contracting Solutions Limited as set out in paragraph 3 above.
6. Waipā District Council opposes the whole of the applications for resource consents described in paragraph 3 above, for the reasons expressed in the following pages.
7. Waipā District Council seeks that the Board of Inquiry declines the applications for resource consent by Global Contracting Solutions Limited to construct and operate a Waste to Energy Plant.
8. Waipā District Council wishes to be heard in support of this submission.



Susan O'Regan
Mayor
Waipā District Council

Introduction

1. Waipā District Council (WDC) welcomes the opportunity to make a submission to the Board of Inquiry on the Global Contracting Solutions Limited (GCSL) applications to develop a waste to energy plant at 381, 401 and 417 Racecourse Road in Te Awamutu (subject site).
2. WDC is responsible for administering an economically diverse and thriving district with one of New Zealand's faster growing populations of rural and urban communities. The towns of Te Awamutu, Kihikihi and Cambridge are vital service towns for surrounding rural areas and support a flourishing mixture of manufacturing, dairy farming, equine and horticultural activities. The district is traversed by two major rivers and important water resources, the Waikato and Waipā Rivers.
3. The district forms part of the high growth Future Proof Subregion centred on Hamilton City and is strategically positioned in the corridor between Auckland and Tauranga. The sub-region is already the fourth largest metropolitan area by population and economic activity in New Zealand. Importantly, both Te Awamutu and Cambridge are sub-regionally significant economic and employment hubs where more than 60% of the working population live and work locally.
4. Under the National Policy Statement on Urban Development 2020 (NPS-UD), WDC is a tier 1 local authority. Using the University of Waikato's 2021 high growth scenario population projection for Waipā as adopted by the Council in 2021, the population of the district is expected to grow from the current estimate of 62,000 to more than 79,000 people by 2050. The NPS-UD applies to the urban environments of Te Awamutu, Kihikihi and Cambridge. The Waipā District Plan has recently been changed to incorporate the medium density residential standards mandated by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
5. The reasons for WDC's submission of opposition to the proposed development are addressed under the following headings:
 - General Comments;
 - Social and Community Effects;
 - Interface of Activities and Appropriateness of Location;
 - Iwi and Mana Whenua Considerations; and
 - Circular Economy impacts

The proposed development, subject site and surrounding environment

6. The key features of the heavy industrial activity proposed include:
 - Construction and operation of a large waste to energy plant comprising 4 buildings with an overall footprint area of 24,592m² and building heights ranging from 9m to 21m, 23m and a maximum height of 38m including chimneys (see Figure 3).
 - 24-hour operation, 7 days a week, all year round.
 - Processing of 480 tonnes of waste transported to the site each day.
 - Earthworks including deposition of fill in a flood hazard area.
 - Discharge of particulates and contaminants to air.

7. Having regard to the Waipā District Plan, the subject site:
 - Is located within the Industrial Zone (see Figure 2). The Waipā District Plan currently has no specific provisions (other than the Specialised Dairy Industrial Area – SDIA) to cater for heavy industry facilities like a waste to energy plant.
 - Is located within the Specialised Dairy Industrial Area associated with Fonterra’s Te Awamutu Dairy Processing Site (see Figures 1 and 2).
 - Adjoins the Mangapiko Stream and is located within a Cultural Landscape Area Alert layer and a Biodiversity Corridor (see Figure 2).
 - Forms part of a flood plain associated with the Mangapiko Stream (see Figure 2).
 - Adjoins Medium Density Residential zoned land (see Figure 3), including an important residential growth cell owned and occupied by Waikato Thoroughbred Racing Incorporated (WTR) (see Figure 1).
 - Lies adjacent to and on the opposite side of the Mangapiko Stream from the major educational facilities of Te Awamutu College and Te Wananga O Aotearoa – see Figure 1). These are situated on Medium Density Residential zoned land.
 - In addition to these major educational facilities, there are The Barnyard daycare, Apakura Te Kakano Early Learning Centre, Puawai Kohanga Reo and Pokuru Playcentre in close vicinity to the proposed facility (see Figure 1)
 - The Waipā District Plan is also required to give effect to Te Ture Whaimana – the Vision & Strategy for the Waikato & Waipā River 2010

Figure 1: Location context of proposed development



Figure 2: Land use and zoning context of proposed development

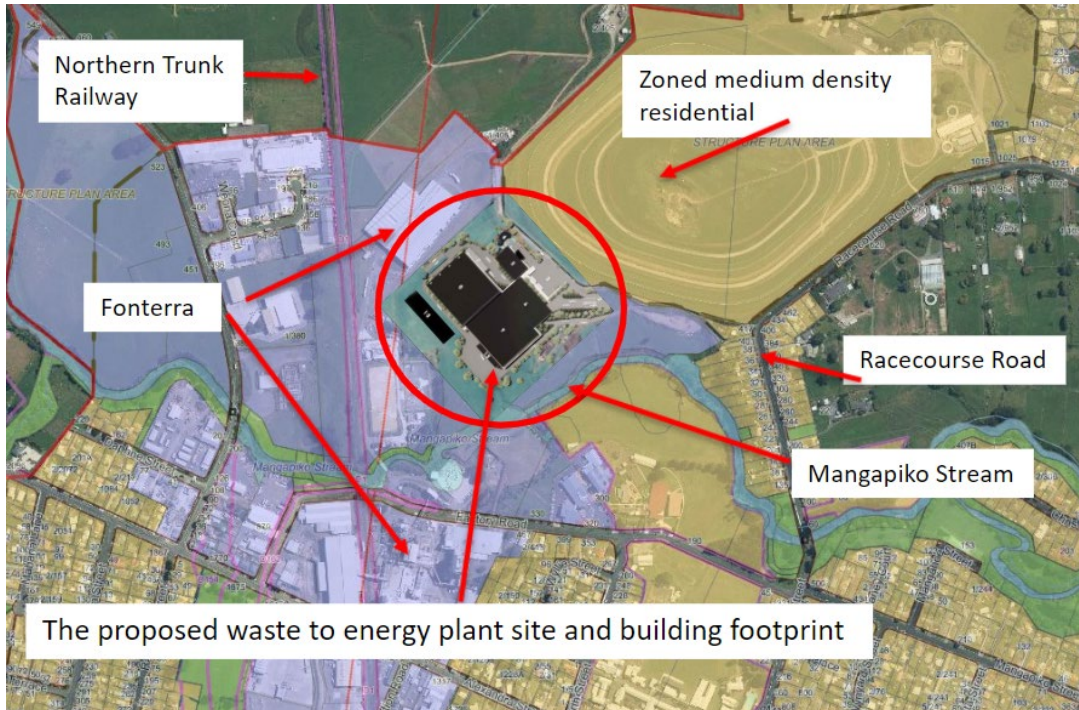


Figure 3: photomontage showing building bulk copied from visual assessment report viewed from the Waipā racecourse 500m away to Northeast of the site. The entire racecourse foreground in this image is zoned Medium Density Residential.



General Comments

8. The growing community of Te Awamutu is home to 14,050 people who live, work, learn and play in the rural town and surrounds. When joined with Kihikihi, the combined urban population is 17,490 people¹. The surrounding landscape is defined by its highly productive Class 1 and 2 soils and its agricultural and horticultural uses. In terms of natural features surrounding Te Awamutu, there are the significant maunga of Kakepuku and Pirongia, and the Mangapiko Stream, a tributary of the Waipā River. The area is remarkable for its special and unique characteristics reflecting the cultural and environmental significance, history and central rural location.
9. The proposed development of a heavy industrial waste to energy plant in a central location in Te Awamutu is considered at odds with general character of Te Awamutu as a thriving farming service centre with a strong emphasis on food processing. If the proposed development is approved, Te Awamutu would be immediately re-characterised as a place where waste is sent to be burnt.
10. Without national guidelines on the development and location of waste to energy facilities, it is not considered appropriate to jeopardise the future of Te Awamutu with this proposed development.

¹ Usually resident population in 2023 according to Statistics New Zealand (StatsNZ)

11. Even with national guidelines, a more appropriate location away from sensitive activities such as residential, education, and food production activities, as well as more community consultation about the safe use of the proposed technology, is also considered a prerequisite for considering such a proposal anywhere in the district.

Historical Context:

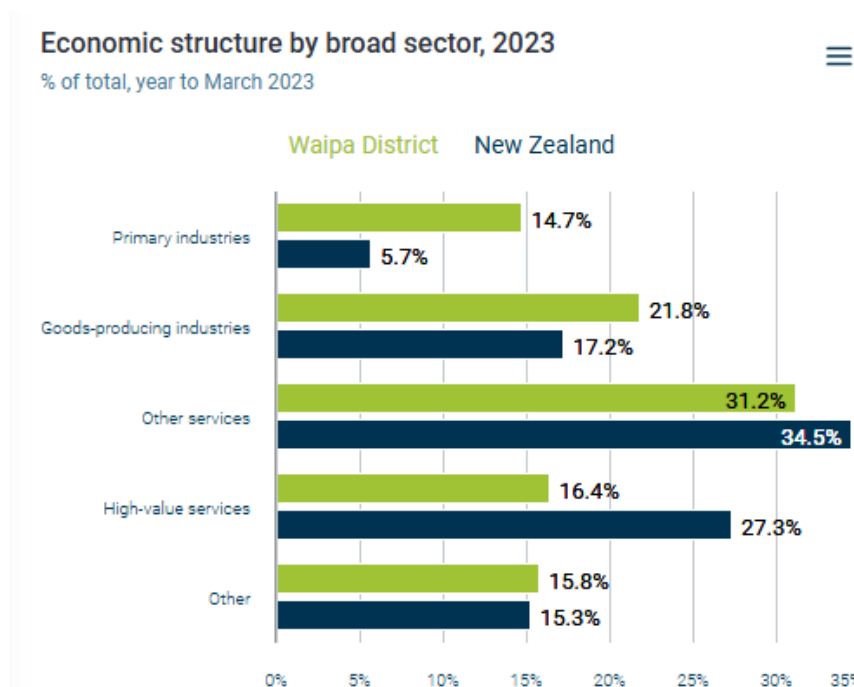
12. The area was named Te Nehenehenui, a great forest, in reference to the massive expanse of kahikatea trees that cloaked the land when the first Māori arrived. Kakepuku maunga, visible in the backdrop of the proposed waste to energy plant, is known as te tatau ki Te Nehenehenui, the door to the great forest. Meandering past the site of the proposed plant is the Mangapiko stream, a waterway prized by Māori for providing food and travel. Many pā were built along the Mangapiko and nearby Mangaohoi stream as the area provided rich growing conditions. When European crops and farming arrived mana whenua adapted quickly. After every harvest the local rivers were busy with goods such as flour, flax, pigs and potatoes being transported to the Auckland markets and further afield to both Australia and the Californian goldfields.
13. Just over one kilometre from the proposed plant is the site of the Ōtāwhao Mission. Established in 1839, the Mission delivered industrial training and furthered the agricultural industry in the area with the purchase of agricultural machinery. Until the Land Wars, Māori and invited European settlers worked collaboratively to develop this into one of New Zealand's most important agricultural areas.
14. Six kilometres to the east of the proposed plant is where the relationships between Māori and Europeans were forever changed during the New Zealand Land Wars. In February 1864, during the height of the Land Wars, the Crown troops attacked Rangiaowhia, a peaceful Māori settlement known for its thriving agriculture. The Rangiaowhia event is remembered as a significant atrocity in New Zealand history and preceded the battle of Ōrākau. It was at Ōrākau that Rewi Maniapoto led approximately 300 defenders in a stand against the British troops to the west of Kihikihi. The defenders suffered heavy losses with the pā being turned into a mass grave.
15. To honour this important history, the Council is planning to develop Te Ara Wai, a museum in Te Awamutu, to recognise and tell the stories of these nationally significant historic events.
16. The work to recognise and acknowledge the Māori cultural historical significance of Te Awamutu and more specifically, the area around the confluence of the Mangaohoi and Mangapiko Streams will be at odds with the proposed development of a heavy industrial plant in a central location within Te Awamutu and adjacent to northern bank of the Mangapiko Stream.

17. The current location is therefore considered ill-suited for the proposed development of a heavy industrial waste to energy facility.

Economic Context:

18. The rich agricultural and horticultural history of Te Awamutu and the Waipā district continues today. Infometrics economic information for 2023 showed Waipā’s district economy to be valued at \$3.5 billion² in 2023 and agriculture represents just over \$500 million, the largest and most important economic sector in the district (see Figure 4 below).

19. *Figure 4: Graph copied from Infometrics Regional Economic Profile showing the economic structure of the district’s economy*



20. According to Fonterra, Te Awamutu is the site of Fonterra’s sixth largest plant producing a range of whole milk powders, butter and milk fat, and is the main producer of buttermilk in the Waikato Region. It has been operating at its current location for 140 years and is a major employer, providing jobs for 330 people.

21. Taken together with Fonterra’s Hautapu manufacturing plant, these dairy factories are important to the local and regional economy. The food producing nature of these sites is

² GDP in Waipa District measured \$3,555.1m in the year to March 2023, up 3.6% from a year earlier. Growth was greater than in New Zealand (2.8%). Infometrics Regional Economic Profile for Waipā 2023

sensitive to other adjacent industrial activities and is protected by the Waipā District Plan through the 'Specialised Dairy Industrial Area'.

22. There is also a related perception issue where both domestic and overseas customers may perceive a potential food safety risk associated with food producing activities such as those of Fonterra and the adjacent Manuka Health (honey) facilities, if they are located adjacent to a proposed waste to energy plant.
23. Te Awamutu is an important education and business hub and service town for the surrounding agricultural and horticultural producers.

Community Context

24. In the immediate vicinity of the site of the proposed plant there are several education facilities. These include Te Awamutu College (High School) and Te Wananga O Aotearoa on Factory Road, The Barnyard daycare, Apakura Te Kakano Early Learning Centre, Puawai Kohanga Reo and Pokuru Playcentre on Racecourse Road. In addition, there is the Ōtāwhao Marae on Taiwhiao Street, and sports grounds are located on Factory Road.
25. When considered in its strategic community context, the site is directly adjacent to the racecourse which is earmarked as an important residential growth cell and zoned Medium Density Residential development potential.
26. The implication is that the site will be right next to a significant residential neighbourhood. Assuming a yield of 25 houses per hectare, the growth cell of 35 hectares can be expected to yield approximately 875 houses and a population of some 2,100 people assuming a household size of 2.4 people per house.
27. Racecourse Road will need to serve as the major access route for these future residents and will also accommodate a significant daily traffic flow of heavy vehicles to and from the proposed plant for bringing the waste feedstock to the site.
28. There is currently no plan or provision for a separation buffer between the waste to energy plant and the future residential development of the racecourse land.
29. Work undertaken by Emission Impossible in 2012³ for Auckland Council and preparation of the Unitary Plan turned to standards used in Australia and recommended a buffer of 500

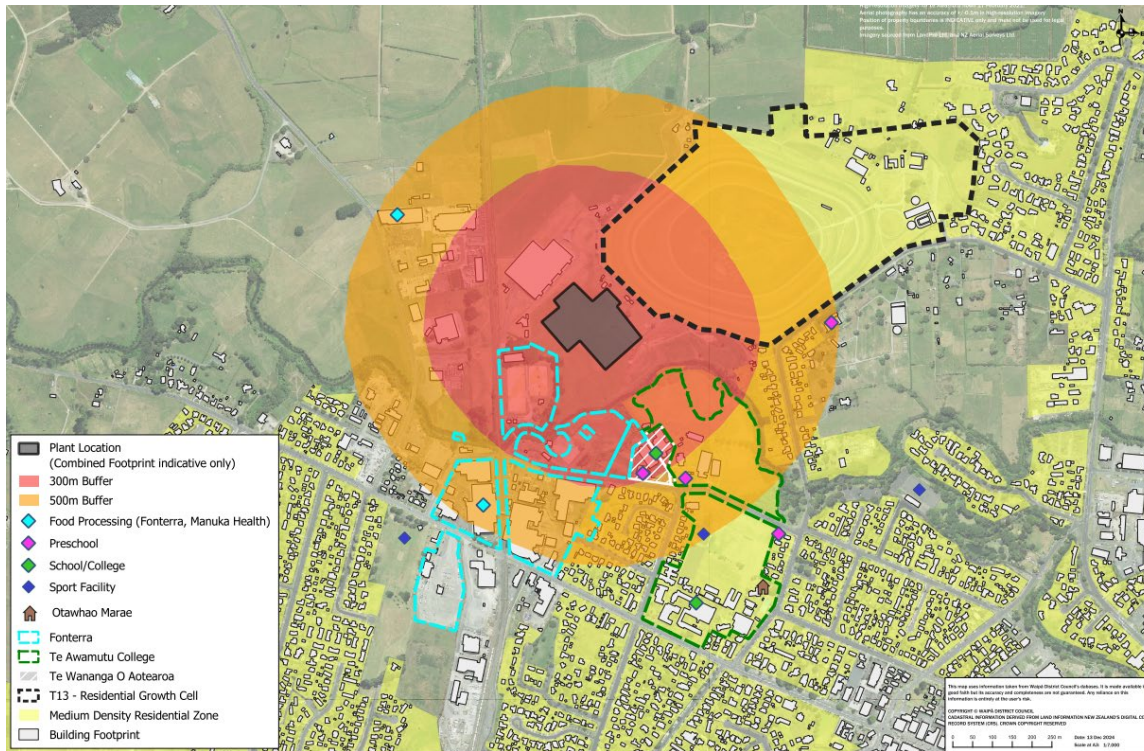
³ Emission Impossible Ltd (Louise Wickham) (2012) Separation Distances for Industry A discussion document prepared for Auckland Council July, 2012.

metres between heavy industry and any sensitive use (such as residential, educational, and sports fields).

30. While the Emission Impossible report does not include specific standards for waste to energy plants, it does have suggested buffer distances for incineration, waste handling and fuel burning. From these it can be inferred that a buffer of between at least 300-500 metres should be considered between a proposed waste to energy facility and residential areas.

31. Figure 5 below shows the extent of possible 300 metre and 500 metre buffers in relation to the proposed waste to energy facility on Racecourse Road.

Figure 5. The extent of a 300metre (red) and 500metre buffer (orange) for the proposed waste to energy facility on Racecourse Road, Te Awamutu.



WDC Submission

32. WDC opposes the proposed waste to energy plant and seeks that resource consent be declined. The reasons for this are set out under the following sections:

- Topic 1 – Social and Community effects
- Topic 2 – Interface of activities and location
- Topic 3 – Iwi and mana whenua considerations
- Topic 4 – Circular economy

Topic 1 - Social and Community Effects

33. The purpose of the Local Government Act 2002 (LGA) is to provide for democratic and effective local government that recognises the diversity of New Zealand communities. The responsibility of WDC in achieving this includes playing a broad role in “promoting the social, economic, environmental and cultural wellbeing” of the Te Awamutu community (Section 3(d) LGA).
34. WDC’s strategic vision⁴ is *Waipā - home of champions, building connected communities*. The related 2021-2031 Long Term Plan aims to create vibrant communities through partnering with mana whenua and supporting community groups in ensuring that Waipā is a great place to live, work, play and invest.
35. WDC’s draft Ahu Ake - Waipā Community Spatial Plan⁵ focuses on delivering community outcomes that achieve Council’s strategic vision and purpose. The Plan is considered by the Council to be its umbrella ‘blueprint’ strategy for how the district should develop over the next 30+ years. Providing for community wellbeing is a key strand woven throughout Ahu Ake.
36. The purpose of the RMA is to promote the sustainable management of natural and physical resources. A key tenant of sustainable management is enabling people and communities to provide for their social, economic and cultural wellbeing and for their health and safety.
37. In achieving the purpose of the RMA, decision makers are required to have particular regard to:
- The maintenance and enhancement of amenity values; and
 - Maintenance and enhancement of the quality of the environment.
38. Both matters relate to the concept of social and cultural wellbeing. Amenity values, being “*physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence and cultural and recreational attributes*” are a key determinant of social wellbeing in locations where people live or where future generations are intended to live.

⁴ From the Waipa 2021 -2031 Long Term Plan

⁵ At the time of writing the Ahu Ake Community Spatial Plan was still in draft with the submission period having closed.

39. In its regulatory capacity, Waipā District Council requested the applicant provide a social impact assessment to enable adequate assessment of effects on social wellbeing to be made. To date this assessment has not been provided.

40. WDC is concerned that the proposal poses actual and potential effects on the health and wellbeing of those who live, learn, work and play in the locality of the proposed waste to energy plant, and the wider district. This includes concerns about:

- In addition to being located immediately adjacent to a residential growth cell, the proposed development would be located near several education and childcare facilities including Te Awamutu College and Te Wananga O Aotearoa, The Barnyard daycare, Apakura Te Kakano Early Learning Centre, Puawai Kohanga Reo and Pokuru Playcentre. There would be unavoidable exposure for people attending the education facilities and sports fields. The location of the proposal could also result in people choosing education facilities further away due to the stigma and actual or potential mental and physical health effects of the proposal. This would involve longer travel times, potentially out of the district, to attend similar education facilities elsewhere. This would be detrimental to the town in terms of loss of pupils, demographic shift, reduced commercial activity and retail spending.
- The agricultural and horticultural farming activities surrounding the town and the food producing factories (Fonterra and Manuka Health) in Te Awamutu are vital to the economic and social wellbeing of the district. Actual and potential effects of the proposed development and stigma associated with proximity to a waste to energy plant, could have detrimental impacts for the town and the district's agricultural and horticultural sectors. These negative impacts could include adverse effects on Waipā and New Zealand's primary sector credibility and export markets.

Summary of reasons relating to social and community effects

41. The relief sought by WDC is that the resource consent applications be declined. The reasons for this are:

- The applicant has provided insufficient information to enable an informed decision on the actual and potential social, cultural and health effects of the proposed waste to energy plant to be made. No social impact assessment has yet been provided.
- Granting consent to the proposal will not promote the sustainable management of the environment in this location. The nature of the activity, its operational

characteristics and its proximity to residential areas, will not enable the people or the community of Te Awamutu to provide for their social, environmental, economic or cultural wellbeing.

- Despite the mitigation measures proposed by the applicant, the proposal will not maintain or enhance amenity values or the quality of the environment in the proximity of the subject site. Additionally, the proposal as it stands could create a negative ‘halo’ effect across an area surrounding the site.
- The plant would create significant off-site impacts through the almost continuous stream of heavy vehicle traffic to and from the proposed facility to bring waste for sorting and burning.
- Given the sensitive nature of the receiving environment, a precautionary approach should be applied to future health effects which could have high potential impact even if there may be a low probability of these occurring.

Insufficient information has been provided to provide reassurance that the proposal will not cause actual and potential short-term and long-term effects on the physical and mental health and wellbeing of those who live, learn, work and play in the locality of the waste to energy site, and the wider district.

- The potential stigma associated with the proposal could cause consequential social issues including but not limited to;
 - the loss of pupils and therefore viability of local schools and kura,
 - demographic shift affecting community resilience and diversity,
 - reduced commercial activity and retail spending,
 - reduced investment in housing development,
 - and detrimental effects on Waipā’s agricultural and horticultural sectors.

Topic 2 – Interface of activities and location

42. Despite the industrial zoning, WDC is concerned that the subject site is not an appropriate location for a heavy industry activity such as the proposed waste to energy plant. There are several reasons for this concern which are set out below under the following headings:

- Specialised Dairy Industrial Area
- Impacts on sensitive neighbouring land use activities and ecology

Specialised Dairy Industrial Area

43. The subject site is located within both the Industrial Zone and the Specialised Dairy Industrial Area (SDIA). The objectives and policies that apply to this area seek to ensure that:

- The industrial zone is developed in a manner that protects the ability for the Fonterra Te Awamutu Dairy Manufacturing Site to continue to operate and expand; and
- Activities on surrounding sites within the SDIA are managed where they could adversely affect the operation of Dairy Manufacturing Sites.

44. This policy direction represents the clear intention of WDC to protect the existing established industry from activities which may be incompatible with food processing activities undertaken by Fonterra.

45. WDC is concerned that the proposed waste to energy plant and its associated discharges are not compatible with the Te Awamutu Dairy Manufacturing Site and are therefore contrary to the policy direction of the district plan.

Impacts on Sensitive Neighbouring Land Use Activities and ecology

46. The policy direction set for the Industrial Zone is to manage effects beyond the Industrial Zone (Objective 7.3.3) and to protect the amenity of surrounding areas (Policy 7.3.3.2).

47. Land to the immediate north of the subject site which is owned and occupied by Waikato Thoroughbred Racing Incorporated (WTR), is located within the Medium Density Residential Zone (MDRZ). This land can be developed under the provisions of the MDRZ at any time without requirement for development of a structure plan. There are no rules in the MDRZ which specify buffer areas in relation to the Industrial Zone boundary.

48. There is high demand for housing in Te Awamutu. Greenfield growth areas such as the WTR land are expected to yield between 25-35 dwellings per hectare. WDC is constrained in identifying new urban areas because of the restrictions imposed by the National Policy Statement for Highly Productive Land 2022.

49. Therefore, it is important to WDC that all existing zoned and infrastructure-enabled land can be developed to its full extent and that resultant development contributes to a well-

functioning urban environment. This has the potential to be compromised by the proposed waste to energy plant. WDC has worked hard to plan for and accommodate growth in accordance with Central Government direction through the district plan. We are already receiving feedback from developers that both the nature of the proposal along with the uncertainty created by it, has already delayed investment and resulted in people choosing to develop elsewhere. This has the potential to affect Council's responsibility to provide for housing demand for the next 30 years.

50. The subject site is also located within the Biodiversity Corridor alongside the Mangapiko Stream. The applicant has provided insufficient information to enable assessment of whether the proposed waste to energy plant will have adverse effects on significant indigenous vegetation or the habitats of indigenous fauna, such as the threatened, and nationally critical native long-tailed bat.
51. Taiea te Taiao, is a group and a project created to promote an ecological corridor to link Maungatautari and Pirongia te aroaro o Kahu. The Mangapiko Stream is part of this corridor to reconnect these maunga/mountains with biodiversity plantings which will enhance native species present, transform iwi connections to the Mangapiko stream, and ultimately improve water quality. The proposal has therefore, the potential to create significant adverse effects on this highly valued community aspiration.

Summary of reasons relating to interface of activities and location

52. The relief sought by WDC is that resource consent be declined. The reasons for this are:
- Insufficient information has been provided to confirm that the proposed waste to energy plant is compatible with the activities of the Te Awamutu Dairy Manufacturing site and other activities within the SDIA.
 - Insufficient information has been provided to confirm that the proposed waste to energy plant is appropriately located and designed to ensure that the amenity of surrounding areas is protected.
 - Development of the proposed waste to energy plant on the subject site may compromise the ability for adjoining greenfield medium density zoned land to be developed to its full extent and to contribute to a well-functioning urban environment.

- The proposed waste to energy plant is not an appropriate use of the subject site when considered in terms of neighbouring land use activities and environmental constraints.
- Insufficient information has been provided to assess whether the proposed waste to energy plant will have adverse effects on significant indigenous vegetation or significant habitats of indigenous fauna, including the native long-tailed bat.

Topic 3 - Iwi and Mana Whenua considerations

53. A Cultural Landscape Area Alert layer applies to the subject site due to its proximity to the Mangapiko Stream. The stream is subject to Te Ture Whaimana as a tributary of the Waipā River.
54. Te Ture Whaimana puts the Waikato and Waipā Rivers at the heart of planning, an approach reflected in WDC's District Plan, partnerships with iwi, mana whenua and the Future Proof Strategy.
55. Te Ture Whaimana seeks to take a whole of catchment approach to restoring and protecting the health and wellbeing of the Waikato and Waipā Rivers, the relationship of Waikato and Waipa River iwi to the river, and the ecosystems that depend on these areas.
56. In its regulatory capacity, WDC requested further information from the applicant in relation to iwi and mana whenua considerations. To date this assessment has not been provided.

Summary of reasons relating to iwi and mana whenua considerations

57. The relief sought by WDC is that the Board of Inquiry ensures all potential effects on the Mangapiko Stream arising from the proposed waste to energy plant and the requirement to give effect to Te Ture Whaimana are considered. In particular:
- The assessment against Te Ture Whaimana does not adequately take into consideration all the potential effects the proposal may have on the Mangapiko Stream and its environs. The assessment provided appears to conclude that the proposal will result in the "betterment" of the Waikato & Waipa Rivers and associated catchments due to restoration planting and retirement of the land from farming. This does not appear to be adequately tested against all the provisions of Te Ture Whaimana.
 - The assessment as provided does not adequately reflect a comprehensive and ongoing engagement process with mana whenua, or reflect their aspirations and issues, including any cultural impact assessment that may be required.

- The assessment does not adequately take account of Iwi Environmental Management plans as recognised under the RMA 1991, Iwi Fisheries Management Plans, or cultural heritage plans.
- The assessment does not appear to consider the new purpose of the land for heavy industry. WDC considers that information should be provided on the mitigation measures proposed for:
 - Impacts on the Mauri/Life force of the Mangapiko Stream and wider catchment
 - run-off from flood events
 - potential firefighting practice or events
 - interaction of rain and air discharges effects on the water quality and ecology of the Mangapiko Stream.

Topic 4 - Circular economy

58. The applicant considers the proposed plant to be part of the solution to reducing the amount of waste going to landfill by providing a way to deal with landfill waste until a circular economy is operating sufficiently. Whilst this view may appear to be a partial solution to ongoing waste management challenges, it does not fully consider the flow on effects, and issues the proposal raises as discussed in this submission, or direction setting by WDC and Central Government regarding waste management and climate change. Environmental sustainability must be a cornerstone of all decision making particularly if the country is seeking projects that deliver long term sustainable benefits.
59. WDC is concerned that the proposal does not align with moving to a circular economy. Key documents of relevance are the WDC's Waste Minimisation and Management Plan 2023 – 2029 (WMMP), which WDC is required to prepare under the Waste Minimisation Act 2008 and the Ministry for the Environment Te Rautaki Para – Waste Strategy 2023 (Waste Strategy). Both documents call for moving towards a circular economy. The concern is that by incinerating waste, it discourages moving towards a circular economy. The plant will require a continual stream of waste to serve as its fuel to stay operational, which could discourage moves to reducing waste and improve moves to reuse and recycle waste to minimise what waste is ultimately residual for disposal.
60. The proposal uses technology that is new to New Zealand and the Waste Strategy advocates a precautionary approach to using waste to energy technologies until they have been tested

and proven⁶. While waste to energy plants are quite widely used around the world to reduce the amount of waste going to landfill, there is concern that burning waste, and in particular plastics, is similar to burning fossil fuels in terms of greenhouse gas emissions to the atmosphere.

61. The proposal does not align with local, national and international obligations to reduce greenhouse gas emissions. WDC's 2021-2031 Long Term Plan acknowledges the need to adapt and mitigate in the community outcome "we are responsive to climate change". WDC does not believe the proposal is an appropriate way to respond to climate change with the greenhouse gas outputs expected to be significant. Nationally, the Climate Change Response Act 2002 requires all greenhouse gases, other than biogenic methane, to reach net zero by 2050. The Act enables New Zealand's obligations under the Paris Agreement, United Nations Framework Convention on Climate Change, and the Kyoto Protocol.

60. Future waste to energy proposals will trigger similar issues due to the lack of Central Government direction on transitioning to a circular economy. The National Infrastructure Plan, currently under development, is an opportunity to provide national direction on the purpose and location of waste to energy plants. Until that national direction is determined, it is inappropriate to allow a Waste to Energy plant to be established particularly within a town like Te Awamutu, as once operational, it will be a permanent part of the town and the regional waste management infrastructure.

61. If this submission and other like submissions are not accepted and the proposed waste to energy plant is approved and resource consents are granted, WDC considers that it is important to ensure that community liaison and mana whenua engagement is an ongoing requirement and obligation of the consent holder. In this respect, all requirements for monitoring the conditions of consent should be through a community liaison group comprising members of the community, mana whenua, iwi and Councils. This requirement should be imposed as a condition of resource consent.

Summary of reasons relating to circular economy

62. The relief sought by WDC is that resource consent be declined. The reasons for this are:

- The proposal does not align with moving towards a circular economy as required by WDC's Waste Minimisation and Management Plan 2023 – 2029 and the Ministry for the Environment Te Rautaki Para – Waste Strategy 2023.

⁶ Page 9 of the Ministry for Environment Waste Strategy (2023)

- WDC believes insufficient information has been provided for decision making. In particular, the questions that arise and remain unanswered include:
 - As per a further information request from WDC dated 11 October 2023 – has any engagement been undertaken with local councils in terms of the supply of municipal waste and if any contracts have been confirmed?
 - Where will the ash that is generated be disposed of?
 - Where will the washdown water be disposed of?
 - Is there a discontinuation plan if the plant was no longer viable?
- The proposal does not align with national and international obligations to reduce greenhouse gas emissions.
- Central Government must provide national guidance on waste to energy plants in the move to a circular economy, including on location of plants if provided for, and ensure that they give effect to national waste minimisation policies.

Conclusion

63. The proposed waste to energy plant has generated unprecedented public interest and opposition to its development proposal for Te Awamutu. Hundreds of submissions in opposition to the development have been lodged. This level of participation and engagement sends a clear signal that there is little community support for and highlights the concerns of the potential for adverse effects associated with the development which merit consideration. Effects in this sense include any potential effects of low probability with high potential impact.
64. The relief sought by WDC is that the applications for resource consent be declined. The principal reasons for this are that the proposed waste to energy plant:
- will have significant actual and potential adverse effects on the environment, including the social, cultural, environmental and economic wellbeing and the health and safety of the Te Awamutu community;
 - is inconsistent with the strategic direction and the objectives and policies of the relevant planning documents including Te Ture Whaimana o Te Awa o Waikato (Te Ture Whaimana), the NPS-UD, the National Policy Statement on Highly Productive Land 2022, the Waikato Regional Policy Statement, and the Waipā District Plan;

- is inconsistent with other matters which are relevant and reasonably necessary to the Board of Inquiry's consideration of the applications including WDC's draft Ahu Ake - Waipā Community Spatial Plan, WDC's Waste Minimisation and Management Plan 2023-2029, and the Ministry for the Environment's Te Rautaki Para – Waste Strategy 2023; and,
- Does not achieve the purpose and principles of the Resource Management Act 1991 (RMA).



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