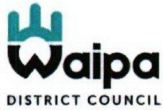


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Submission on a Notified Resource Consent Application

Form 13

Resource Management Act 1991

WDC REF: LU/0323/21

THE INFORMATION ON THIS PAGE IS REQUIRED FOR ADMINISTRATION PURPOSES ONLY AND IS NOT PART OF THE SUBMISSION.

YOUR DETAILS: <i>(please write clearly)</i>	
Title:	Miss
Name of submitter:	Summer Wright, on behalf of whānau group, including Candida Hamana, Hazel Coromandel-Wander, Thea King, Monique Kapua, Orewa Barret-Ohia, Ziahr Pye, Tania Te Wano, Chinekwa Pye
Organisation: (if applicable)	Ngāti Apakura, Ngāti Maniapoto
Address for correspondence:	[REDACTED]
	Post Code: 4410
Email:	[REDACTED]
Contact phone number:	[REDACTED]

PLEASE NOTE:
The Resource Management Act 1991 requires submissions to be made available to the public.
Your contact details are collected:
<ul style="list-style-type: none">To arrange a hearing date and time for you to speak (if you choose to); andTo inform you of any decisions made on issues covered by your submission.
Your name and address will be publicly available. If you do not supply your name and address the Council will formally receive your submission, but will not be able to inform you of the outcome.



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

My submission is:

Oppose parts or all of the application

- *the reasons for your views.*

We are uri (descendants) of Ngāti Apakura, manawhenua of the area, and Ngāti Maniapoto, and have long held strong connections and presence in Te Awamutu and surrounds. We are pleased to be able to submit on this issue.

We oppose the applications to Waipā District Council LU/03/2321 and Waikato Regional Council APP143988 on multiple grounds.

We see the proposed land use for the waste to energy incinerator in Waipā as highly problematic.

Firstly, the application conflicts with district plans.

- This area is not identified as an area for industrial development in the District Plan. The location of a heavy industrial operation immediately next to existing and planned residential housing, schools and food businesses, and operating 24-hrs/day, 7day/week is not appropriate and conflicts with the intentions of the Waipā District Plan and Growth Strategy for the community.
- Te Awamutu War Memorial Park Plan 2021 specifies a vision that,
 - Acknowledge historical and cultural significance, and honour the history of place
 - Support the restoration of the awa Mangaohoi Stream and Mangapiko Stream
 - Provide opportunities for education and play, grounded in ecology and culture;

- Provide future opportunities for potential multi-use of existing reserve facilities;
- Reinforce and strengthen the reserves design, aesthetic and visual identity through a proposed broad shared pathway spine.
- The proposed incinerator would detract from all aspects of the above vision, which was co-developed with manawhenua and Waipa District Council. To go against this plan would risk the relationships the Council has with manawhenua, and negate future potential for the above vision.
- It is not appropriate to have an incinerator burning millions of tyres next to a milk production facility, which produces food for the region and beyond.
- The site is entirely unsuitable for a large-scale waste incinerator. The current “Specialised Dairy Industrial Area” designation means that the land use is intended to ensure that any activity there was aligned with Fonterra’s activities.
- The very large size of the building and stacks is not congruent with the surrounding area and landscape. Any hopes or plan for a flourishing Waipā area are diminished, for little returns to the community.

Secondly, the application demonstrates little consideration of its cultural impact.

- The application contains no formal Cultural Impact Assessment.
- Fully informed consent from Iwi and Hapū must be part of this proposal including clear disclosure of human health and environmental impacts. This has not happened.
- Taiea te Taiao was created to promote an ecological corridor to link Maungatautari and Pirongia te aroaro o Kahu. This corridor will 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. An incinerator will undermine these efforts.
- Mangapiko is the traditional home of Pekehawani, our taniwha. The incinerator would majorly undermine the mauri of Mangapiko and Pekehawani, and this is entirely unacceptable.
- Mangapiko and Mangahoe awa are main features of Te Awamutu, and hold our histories. The awa are a key tohu/feature for the reserve to welcome locals and manuwhiri/visitors wanting



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

to connect to Te Awamutu. The convergence of these awa give rise to the name "Te Awamutu".

To diminish them is to diminish the entire area. These awa were prime sites for pā harakeke/flax and pā rongoā/medicinal plants that provided the resources for life in Kaipaka pa and also hold cultural significance in that way.

- A key aspect of the Te Awamutu War Memorial Park Plan 2021 is restoration of these awa, which will enable reconnection to place and narratives embedded in them, not only for manawhenua but for all residents and visitors. Protecting these awa protects this potential, which in our view, is infinitely more powerful and important than any monetary gain from an incinerator.

Thirdly, there will be significant climate change impacts that are at odds with both the Waipā District Council's and Waikato Regional Council's environment plans and visions.

- Waipā District Council states it has a 2053 vision, where it states "*Council works with communities to facilitate the sustainable improvement and protection of the mauri of the environment*". The installation of the proposed incinerator would only detriment the mauri of Waipā, and majorly negate other Council and community efforts for climate mitigation and environmental protection. However, declining the application would not detriment this vision and would fulfil "Taking a balanced approach" and "protection" and "being knowledge led".
- The incinerator will be a massive local contributor to climate change. It will directly add about 150 kilo tons per year of CO₂. The facility would have a carbon footprint many times greater than the same amount of waste being sent to landfill.
- This is especially important given that the entire area is a floodplain; contributing to climate change nearby is deeply problematic as the area is already prone to flood and climate change related events.
- The incinerator will use non-renewable feedstock (plastic waste, tyres, mixed solid waste & flock) to create energy: this is equivalent to a fossil fuel production plant, but much dirtier and riskier. The addition of non-renewable energy from waste works against efforts to decarbonise the energy sector.

The application would worsen flood risks.



- The entire proposed site is a floodplain - most of the site is designated a High Risk Flood Zone.
- The river has been straightened and narrowed over time to enable development, this is now considered one of the major causes of flooding. Allowing rivers the ability to spread to accommodate severe rainfall events in future protects infrastructure, business and housing from inundation. Allowing Waipā to follow its natural course enables its mauri to perpetuate to the extent currently possible.
- The new incinerator buildings would increase flooding spread to the Fonterra factory and houses on Factory Road, numbers 331-467
- The company wants to build its building lower than existing requirements (because it will cost them a lot more money to build to the required levels). This will mean even greater risk to the community.
- Insurance companies are warning New Zealanders not to build on floodplains due to climate change. The incinerator may become uninsurable, and the community left with the clean up bill.

The proposal would create significant air, water, and land pollution and desecrate the area.

- Stormwater from the site will be discharged into the Mangapiko Stream. This water is likely to be contaminated with heavy metals and dioxin. Filtration systems and settlement ponds do not eliminate all of the toxic products meaning these will make their way into the waterways. Waipā awa is already generally unsafe for swimming, but with effort this can be remedied. Polluting its tributaries even further is a desecration and entirely unacceptable to us. The pollution will harm current and future generations and community ability to enjoy the awa. The huge earthworks over several years will impact the health and wellbeing of the Mangapiko River.
- The incinerator will produce dioxins that are cancer-causing even in extremely low levels. These will be emitted into the air and will settle on the land and in the water. There is no safe level of dioxins, and these “bio-accumulate” - meaning that over time they build up in human fat tissue and in animals.
- There is no assessment of land contamination included in the application. International research shows that the land surrounding incinerators can be extensively contaminated with heavy metals, microplastics and other toxic emissions including dioxin.

- One of the emissions from burning tyres/tyre derived fuel is zinc oxide which has not been modelled and which is highly toxic to aquatic life.

There are numerous other risks and toxic byproducts.

- The incinerator would produce 23 tonnes/day of toxic ash which has to be landfilled. Incinerator ash contains heavy metals, microplastics and dioxins. This is ironic given that the entire alleged value proposition of the incinerator is to reduce waste to landfill.
- The storage of highly contaminated wastewater and other hazardous substances on site risks spills and wider contamination.
- There is no risk assessment of the possibility of fire or explosion despite the storage of hazardous materials and highly flammable feedstock. The community only has a volunteer fire brigade. This is highly unfair to the community.

The technology is untested and there is little evidence for its safety.

- At present Aotearoa New Zealand has no municipal solid waste (MSW) incinerators. The incinerators that were in operation around 2000 have all closed. Many of them were a significant source of dioxin contamination
- A similar, larger, proposal for a waste-to-energy incinerator in Waimate, South Canterbury has been “called in” by the Minister for the Environment in part because this is new technology with national implications.
- Te Awamutu does not want to be a testing ground for this technology
- Global Contracting Solutions does not have any experience of operation in waste incineration. It is a scrap metal business. The company does, however, have a track record of violating resource consent conditions in their Hamilton operations.

There are alternatives, and this is the worst option available.

- Te Awamutu will need to import almost all of the material for this facility from outside of the district. This is not a proposal for the benefit of the community.
- The company has no contracts for the delivery of the feedstock except from its own operations (as Global Metal Solutions). This means it is impossible to know what hazards, risks and emissions exist because only a small percentage of the feedstock is known. It also means that the company

is more likely to burn recyclable materials and other things because it must always continue to operate. It will directly work against efforts to minimise waste.

- The inclusion of 35,058 tonnes of plastic (as well as a considerable portion of MSW that includes plastic) does not align with the recently released National Plastics Action Plan for Aotearoa New Zealand by the Ministry for the Environment
- Incineration does not replace the need for landfills - instead it takes ordinary materials and concentrates them into more toxic ash.
- **The Waipā District Council has a great waste minimisation plan and opportunities for more comprehensive zero waste strategies that would fit with the goals of minimise wastes, while meeting community aspirations for a healthy environment, job creation and mitigation of climate emissions.**
- Investing hundreds of millions of dollars into an incinerator locks in the need for continued production of waste, meaning the community misses out on other waste uses further up the waste hierarchy (like reuse, repair and repurposing).

There are profound implications for the health of the community.

- There is no human health assessment of this proposal
- The incineration plant is a hazardous facility with serious risks of harm to human health. The plant will emit cancer-causing dioxins and furans, sulphur dioxide, nitrogen oxide, mercury and particulate matter will be released into the air.
- Dioxins damage the human immune system and cause cancer. Studies have shown direct links to non-Hodgkins lymphoma, increases in risks of miscarriages and pre-term delivery of babies. There are links to reduced male fertility. Exposure to particulate matter impacts those with respiratory problems such as asthma, cardiovascular issues, the elderly and children.
- In the Netherlands, research conducted indicated that the high dioxin output from waste incinerators could be responsible for contamination of cow's milk and meat. As a result, the production and sales of dairy products was prohibited for several years.
- In 2016, human-made (anthropogenic) air pollution in New Zealand resulted in an estimated 3,317 premature deaths (in people aged 30+ years). The largest causes were NO₂ and PM_{2.5}. There were 32 premature deaths due to air pollution (PM_{2.5} and NO₂) in Waipā District (among people aged

30+ years) in 2016. The incinerator will significantly add to these pollutants, and therefore, contribute to the premature death of Waipā residents.

- Under NZ's air quality standards, it is illegal to burn even one tyre because the health and environmental effects are so toxic - yet, this project is proposing to burn 35,000 tonnes a year. Burning tyres emits cyanide, carbon monoxide, sulfur dioxide, and products of butadiene and styrene. And the smell of those tyres burning will fill the community with an unbelievable stench.
- The odour and dust have not been adequately assessed. There is no indication of how often the start-up/maintenance will be done and levels exceeded.
- There will be significant additional traffic in a residential area, adding to air pollution and impacting those who are old, very young and immunocompromised. It will change the nature of the community from a quiet residential street to an unsafe and busy thoroughfare of trucks at all hours of the day and night.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Decline all parts of the application

I wish (or do not wish) to be heard in support of my submission.

- If others make a similar submission I will consider presenting a joint case with them at the hearing.**

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____ S WRIGHT _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Whanau Group

Date: ___6/10/2023 Contact person: Summer Wright
(name and designation, if applicant)

Postal address: 426a Ruahine Street, Terrace End, Palmerston North 4410

(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

My submission relates to the whole application

My submission is:

Support parts or all of Oppose parts or all of are neutral parts or all of
include—

- the reasons for your views.

Air pollution, water pollution, noise + traffic concerns
Overall bad idea to remove waste.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I oppose the whole application. I would like the
Waipa District Council to decline this application
from Global Contracting Solutions Ltd.

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 5/10/23

Contact person: Kate Wetten
(name and designation, if applicant)

Postal address: 433 Rewi street, Te Awamutu, 3800
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991. You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority. If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840. If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz. If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Waka Kotahi NZ Transport Agency Reference: 2023-1347

12 October 2023

Waipa District Council
C/- Tracee Berry (Senior Planner)
Private Bag 2402,
Te Awamutu 3800

Via email: submissions@waipadc.govt.nz

Dear Tracee,

Submission on Waste to Energy Plant – 401 Racecourse Road, Te Awamutu – Council Reference LU/0323/21

Attached is the Waka Kotahi NZ Transport Agency submission on the proposal by Global Contracting Solutions Limited for a waste to energy plant at 401 Racecourse Road in Te Awamutu (Waipa District Council Reference: LU/0323/21).

We welcome the opportunity to discuss the contents of our submission with Council Officers and / or the applicant.

If you have any questions, please contact me.

Yours sincerely



Luke Braithwaite
Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Phone: (04) 978 2643

Email: luke.braithwaite@wta.nzta.govt.nz

CC Global Contracting Solutions Limited
C/- Terra Consultants,
PO Box 5028,
Frankton 3242
Sent via: richard.falconer@terragroup.co.nz

Submission on Waste to Energy Plant – 401 Racecourse Road, Te Awamutu – Global Contracting Solutions Limited

To: Waipa District Council
C/- Tracee Berry (Senior Planner)
Private Bag 2402,
Te Awamutu 3800
Via email: submissions@waipadc.govt.nz

From: Waka Kotahi NZ Transport Agency
Level 1, Deloitte Building
24 Anzac Parade
Hamilton 3240

1. This is a submission on an application from Global Contracting Solutions Limited for:

To construct and operate a 'Waste to Energy' plant, which generates power through the combustion of refuse-derived fuel. The activity status of this proposal is Non-Complying.

2. Waka Kotahi NZ Transport Agency (Waka Kotahi) could not gain an advantage in trade competition through this submission.

3. Role of Waka Kotahi

Waka Kotahi is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Rounding Powers Act 1989. The primary objective of Waka Kotahi under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by Waka Kotahi. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

4. State highway environment and context

State highways are physical resources of local and national importance and as such, compromising the safe, effective and efficient operation would be contrary to several District Plan Objectives and Policies.

The waste to energy plant is reliant on access via the State Highway 3 / Racecourse Road intersection for all heavy commercial vehicles and a significant portion of light vehicles associated with operations and staff. State Highway 3 carries approximately 13,549 vehicles per day and is identified as a regionally important highway providing a connection between the Waikato and Taranaki Regions, with the immediate section of State Highway 3 providing a critical connection between Hamilton City and the Waipa District.

5. The specific parts of the application that this submission relates to are:

Waka Kotahi has undertaken an assessment of the integrated transportation assessment (ITA) prepared by Commute Transportation Consultants and determined that the report is insufficient for Waka Kotahi to adequately consider and provide our position on the acceptability of effects of the proposal on the State Highway 3 / Racecourse Road intersection.

6. The submission of Waka Kotahi is:

- (i) Waka Kotahi is opposed in part to the waste to energy plant to the extent outlined in this submission.
- (ii) The specific provisions of the proposal that the Waka Kotahi submission relates to, and matters which Waka Kotahi is interested in are related to the proposal's impact on the State Highway 3 / Racecourse Road intersection and associated safety concerns.
- (iii) The ITA prepared by the applicant has been determined to be of an insufficient standard to be able to appropriately understand the effects of the proposal on this intersection. Additionally, was prepared two years ago (December 2021) as such no longer current or appropriate to consider the current roading environment.
- (iv) The applicant's proposal is anticipated to generate 378 vehicle movements per day, of which 139 are heavy commercial vehicles, with a peak of 84 vehicle movements per hour. This equates to approximately a 27% increase in total vehicle movements and a 201% increase in heavy commercial vehicles¹ on Racecourse Road. The applicant has not provided appropriate justification that this increase in vehicle movements will not impact on intersection function and safety.

7. Waka Kotahi seeks the following decision from the consent authority:

- (i) Waka Kotahi seeks clarification and/or commitment from the applicant in relation to providing an updated ITA that includes/addresses:
 - a) Effects at the intersection during peak anticipated vehicle volumes both from the facility and on the state highway;
 - b) Intersection sight distances;
 - c) A full road safety assessment;
 - d) The effects of the proposal on pedestrians and cyclists.
 - e) A 10 year analysis of the intersection capacity to understand the ability to accommodate this proposal in the medium to long term;
 - f) Clarification on the average and peak number of vehicles and how these figures have been derived.
 - g) Vehicle tracking for the vehicles associated with the facility; and,
 - h) Mitigation required to provide for the facility and associated vehicle movements.
- (ii) Any other relief that would provide for the adequate consideration of potential effects on the State Highway 3 intersection with Racecourse Road and its users.

8. Waka Kotahi does wish to be heard in support of this submission.

9. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.

10. Waka Kotahi is willing to work with the applicant in advance of a hearing.

¹ Based on the Commute Transportation Consultants Assumption of Current Volumes of 5% Heavy Commercial Vehicles.

Yours sincerely



Luke Braithwaite
Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date: 12 October 2023

Address for service: Waka Kotahi NZ Transport Agency
Level 1, Deloitte Building
24 Anzac Parade
Hamilton 3240

Contact Person: Luke Braithwaite
Telephone Number: (04) 978 2643
Email: luke.braithwaite@wta.nzta.govt.nz
Alternate Email: EnvironmentalPlanning@nzta.govt.nz

From: [REDACTED]
Sent: Thu, 12 Oct 2023 08:25:24 +1300
To: "Submissions" <submissions@waipadc.govt.nz>;
"rcsubmissions@waikatoregion.govt.nz" <rcsubmissions@waikatoregion.govt.nz>;
"richard.falconer@terragroup.co.nz" <richard.falconer@terragroup.co.nz>
Subject: External Sender: DONT BURN WAIPA!
Categories: Donna

CYBER SECURITY WARNING: This email is from an external source - be careful of attachments and links. Please follow the Cybersecurity Policy and report suspicious emails to Servicedesk

To whom it may concern,

LU/0323/21 and APP143988

Re: Global Contracting Solutions Ltd's 'The Waste Incineration Plant' application

I am writing to oppose the application to develop a Waste Incineration Plant in Te Awamutu. This letter is specifically in regards to Global Contracting Solutions Ltd's application. I am requesting that this application for the Waste Incineration Plant be declined. This letter is directed to the Waipa District Council and the Waikato Regional Council.

To follow are the reasons I oppose this application.

1. It opposes everything that climate change talks about.
2. How does this fit in with climate change policies?
3. The proposed area is so close to residential housing and schools, we do not want nor want our elderly and our children to be breathing in toxic air

Sarah Williams
2/141 Hiskens Place
Te Awamutu

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

All Of the Application

My submission is:

Support parts or all of **Oppose** parts or all of **are neutral** parts or all of
include—

- *the reasons for your views.*

I oppose all of this Application because this would bring Toxic and hazardous waste into our community. My Family and Community do not want to have to live with the noise, smell and Toxins which will come with this plant.

As a friend of several with young children who attend the barnyard daycare only 150m from the proposed site, I Do not want their children (who don't have a choice) to be breathing the toxic air or smell that will come only metres from where they spend a majority of their day. It is unfair for Parents of these children to have to either relocate their daycare (which would be difficult as there is currently waiting lists at the majority of other daycares in the area) or for the children to have to be breathing such toxic air. It is also unfair of 1 business to set up this plant causing other businesses (like the daycare who have multiple animals to consider, or the horse stables next door) to go out of business from either losing their income or having to relocate themselves due to unliveable conditions.

As an owner of a building company in the community I also think this plant will be detrimental to our business. People will be less likely to want to move to the area that has a Toxic plant and will stunt the growth of our business and the housing market. The Current developments that over look the proposed sites will become less appealing and may cause financial stress for those involved as they are already underway and money already spent with development construction.

If there was to be an explosion this could be catastrophic for those closest, Including the daycare and high school and residents (as this is also a residential area). I know I would hate to be on the receiving end of being told my child was next to a window that blew out because of an explosion at the plant, and my child is seriously injured or worse.

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

There is no human health assessment of the cumulative effect of the pollution, toxic ash and nano particles. I certainly do not want to be part of a statistic of the community of Te Awamutu who could have long term health issues due to these untested facilities.

Our towns Fire Brigade is Voluntary and already our first aiders are often at capacity to service our town when in need. Adding the possibility of a long term fire at the plant or call outs needed as a result of the plant malfunctioning (Which has been proven in other plants) our local first responders would not cope with the added needs and would then also put our community more at risk.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Decline Application

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: Jade Wilson
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/2023 Contact person: Jade Wilson
(name and designation, if applicant)

Postal address: 110A Laird Place, Te Awamutu, 3800
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

All Of the Application

My submission is:

Support parts or all of **Oppose** parts or all of **are neutral** parts or all of
include—

- *the reasons for your views.*

I oppose all of this Application because this would bring Toxic and hazardous waste into our community. My Family and Community do not want to have to live with the noise, smell and Toxins which will come with this plant.

As a friend of several with young children who attend the barnyard daycare only 150m from the proposed site, I Do not want their children (who don't have a choice) to be breathing the toxic air or smell that will come only metres from where they spend a majority of their day. It is unfair for Parents of these children to have to either relocate their daycare (which would be difficult as there is currently waiting lists at the majority of other daycares in the area) or for the children to have to be breathing such toxic air. It is also unfair of 1 business to set up this plant causing other businesses (like the daycare who have multiple animals to consider, or the horse stables next door) to go out of business from either loosing their income or having to relocate themselves due to un liveable conditions.

As an owner of a building company in the community I also think this plant will be detrimental to our business. People will be less likely to want to move to the area that has a Toxic plant and will stunt the growth of our business and the housing market. The Current developments that over look the proposed sites will become less appealing and may cause financial stress for those involved as they are already underway and money already spent with development construction.

If there was to be an explosion this could be catastrophic for those closest, Including the daycare and high school and residents (as this is also a residential area). I know I would hate to be on the receiving end of being told my child was next to a window that blew out because of an explosion at the plant, and my child is seriously injured or worse.



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

There is no human health assessment of the cumulative effect of the pollution, toxic ash and nano particles. I certainly do not want to be part of a statistic of the community of Te Awamutu who could have long term health issues due to these untested facilities.

Our towns Fire Brigade is Voluntary and already our first aiders are often at capacity to service our town when in need. Adding the possibility of a long term fire at the plant or call outs needed as a result of the plant malfunctioning (Which has been proven in other plants) our local first responders would not cope with the added needs and would then also put our community more at risk.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Decline Application

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: Michael Wilson
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/2023 Contact person: Michael Wilson
(name and designation, if applicant)

Postal address: 110A Laird Place, Te Awamutu, 3800
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Submission on a Unified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4), Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

The entire application

My submission is:

Support parts or all of include— Oppose parts or all of are neutral parts or all of

- the reasons for your views.

Scientific research

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the entire application

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission (this means that you will speak at the hearing)
I do not wish to be heard in support of my submission (this means that you will not be advised of the date of the hearing and will not speak at the hearing)
If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant. (this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: *J Bester*
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: *12/10/2023* Contact person: *Jeamien* *wise options*
(name and designation, if applicant) *Jeamien Bester*

Postal address: *91 Scott Rd RDB Te Awamutu.*
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

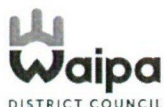
- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

- ✓ (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

adversely affects the local environment being residential +
farming
also a major disadvantage to roading via trucks coming in

My submission is:

Support parts or all of Oppose parts or all of are neutral parts or all of

include—

- the reasons for your views.

- toxic to environment - could cause serious illness / birth defects
- very detrimental to Traffic Volume & ruination
of already inadequate roading
- ruination of land values & environment

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Deny the application



I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ✓ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ✓ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter:  
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 10/10/2023 Contact person: Cavin or Rhonda Wood
(name and designation, if applicant)

Postal address: 136 Cochrane Rd RD2 Ohauyo 3882
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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THE INFORMATION ON THIS PAGE IS REQUIRED FOR ADMINISTRATION PURPOSES ONLY AND IS NOT PART OF THE SUBMISSION.

YOUR DETAILS: <i>(please write clearly)</i>	
Title:	Mr Mrs <u>Ms</u> Miss Dr
Name of submitter:	Amanda Waitere
Organisation: (if applicable)	
Address for correspondence:	6 Albert place Ngawa whia
	3720
	Post Code:
Email:	[REDACTED]
Contact phone number:	[REDACTED]

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

- Air emissions;
- Employment benefits; and
- Electricity security.

My submission is:

Support parts or all of include— **Oppose** parts or all of **are neutral** parts or all of

- the reasons for your views.

See attached submissions

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

to grant the resource consents sought by Global Contracting Solutions Limited.

I wish (or do not wish) to be heard in support of my submission.



I do wish to be heard in support of my submission
(this means that you will speak at the hearing)

- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/~~do not request~~*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13-10-2023 Contact Amanda Waitere person:

(name and designation, if applicant)

Postal 6 Albert Place Ngauru whia address:

(or alternative method of service under section 352 of the Act):

Submission for Public Notification – Paewira

Introduction

1. My name is Amanda Waitere. I work at Global Metal Solutions Limited as in House Counsel. Prior to that I worked as a Solicitor for 15 years. At GMS I manage Legal, HR and Health and Safety and Compliance.
2. I have been involved with this a Waste to Energy (“WtE”) project since I started working at GMS in approximately March 2020.
3. Our proposal to build a WtE plant in Te Awamutu is a technological solution for the major waste issues we have in NZ. NZ as a society has become desensitised to the toxic environmental impacts of landfill. There are currently 300 toxic landfills in need of remediation in NZ that are poisoning the environment. The only resolution we currently have for resolving this issue is to remove the material and put it into another landfill. We propose to use WtE to divert waste from landfill, remediate old landfills and turn the waste into electricity.

Global Metal Solutions Limited

4. At GMS we produce a waste product called "floc". It is a product of the steel processes we use to sort our material. It is the non-metal waste material from mostly cars. This material is not recyclable, and it cannot be repurposed or reused. It currently goes to landfill. We want to be able to process the Floc in our WtE plant so that we can create a zero-waste process at GMS. We will be able to recycle all of the metal we collect and then turn the waste product Floc, into electricity.
5. Our proposal is a ground-breaking initiative for New Zealand, and has the potential to dramatically improve the waste management landscape.
6. In my submission I want to highlight three particular areas of the project that will benefit the Te Awamutu community. An issue has been raised about potentially toxic air emissions. This has been a controversial topic that has been used by Zero Waste to create fear and concern amongst the people in Te Awamutu about our project.
7. Also, we believe the project will provide the economic benefit of employment project to Te Awamutu.
8. The third benefit is energy security for the community. The proposed WtE plant can provide electricity to the community that is not dependent on, coal, solar, wind or hydro energy.

Air Emissions

9. One of the criticisms of our project that has been alleged by in particular Zero Waste, is that we will release toxic emissions into the air that will be detrimental to the environment and to human health in Te Awamutu. This is not true. We rely on the expert advice that we have received from Terry Brady Consulting Limited on this issue. His report is set out at Appendix 16 of the Application.

10. The WtE plant we propose to build uses proven technology that will strip out pollutants resulting in effects that are compellingly demonstrated as less than minor. Terry's advice is that the air discharges from the plant are benign.

Employment

11. At GMS employment is one of the aspects of the business that we believe provides important benefits for our whānau and the community. GMS is a Māori owned whānau business. We are hoping to be able to also provide employment benefits through our WtE plant in Te Awamutu. There will be a total workforce of 60 staff, including engineers (27), a recycling team (22), a yard team (8) and office/other staff (6). At night there is likely to be a minimum of 20 staff at the site, increasing to around 40 during the day.
12. The benefits of this employment will be significant to the local economy in Te Awamutu. A business of the size proposed by our project This is discussed in the Economic Assessment Report from Formative. The report is at Appendix 20 of the Application.

Energy Security

13. Paragraph 4.3 Economic Assessment Report from Formative also states that our proposed WtE plant can improve the reliability and resilience of power supply within the Waipa District. The energy security provided by our proposed WtE plant will be a significant benefit for the Te Awamutu Community.

Project Support

14. I support this project 100%. We have an excellent team of experts guiding us with regard to the resource consent process and the technology. My submission is that Global Contracting Solutions Limited should be granted the resource consents that they seek so that the project can progress.

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/ directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

My submission relates to the entire application.

I want Waipa District Council to decline this application.

My submission is:

Support parts or all of **Oppose** all of **are neutral** parts or all of

include—

- *the reasons for your views*
- Te Awamutu or any other town in New Zealand does not want to be a testing ground for this untested technology. Global Contracting Solutions Ltd does not have any experience of operation in waste incineration. It does however have a good track record of violating resource consent conditions in their Hamilton operations. There has been no health assessment for this proposal. We do not want our residents, visitors and future generations being subjected to dangerous Dioxins bring admitted into our air.
- _____

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I expect Waipa District Council to decline all of this application

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 11/10/2023 Contact person: Janet
White
(name and designation, if applicant)

Postal address: 795 Pokuru Road R D 5 Te Awamutu 3875

(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

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Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

_____ All of it

My submission is:

Support parts or all of **Oppose** parts or all of **are neutral** parts or all of

include—

- *the reasons for your views.*

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I am a mother of two who has lived in Waikato for over 15 years. I'm a lifelong environmentalist who has worked with scientists at the cutting edge of climate change science. I'm proud to say that my daughter is now working in the field of emissions reduction, and I believe strongly that we need to do all we can to limit the human impact on the global warming of the earth, and this includes reducing waste by finding alternative solutions other than incineration.

I have no confidence in the ability of Global Metal Solutions Ltd and its owner, Craig Tuhoro, to operate within the scope of the Resource Management Act. In 2020-22, Hamilton City Council successfully challenged the company at the Environment Court about acoustic breaches at its processing plant in Hamilton. The incinerator technology would be a first for New Zealand and would be a risky experiment in a peaceful rural town.

The Waipa District vision for 2053 includes preservation of rivers, streams and wetlands. This is at odds with the incinerator application which acknowledges the treated water will flow out into the Mangapiko river. Incineration is going to create raised air temperatures as well as airborne toxic particles. As these particles land, they will leach into the soil in the surrounding area affecting humans and animals. There are likely to be increased respiratory problems within the town. A zero-waste approach would concentrate on finding better products and ways of recycling/upcycling rather than just burning. The Waipa District Council has a great waste minimisation plan and opportunities for more comprehensive



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

zero waste strategies that would fit with the goals of minimising waste, while meeting community aspirations for a healthy environment, job creation and mitigation of climate emissions. Investing hundreds of millions of dollars into an incinerator locks in the need for continued production of waste, meaning the community misses out on other waste uses further up the waste hierarchy (like reuse, repair and repurposing).

The incinerator will use non-renewable feedstock (plastic waste, tyres, mixed solid waste & flock) to create energy: this is equivalent to a fossil fuel production plant, but much dirtier and riskier because of the different composition of the materials. The addition of non-renewable energy from waste works against efforts to decarbonise the energy sector. The incinerator will be a massive contributor to climate change. It will directly add about 150 kilo tons per year of CO₂. The facility would have a carbon footprint many times greater than the same amount of waste being sent to landfill.

Under NZ's air quality standards, it is illegal to burn even one tyre because the health and environmental effects are so toxic. Yet this project is proposing to burn 35,000 tonnes a year. The proposed site is next to a food production facility. There is no way that airborne pollution from the incinerator should be considered appropriate for potentially getting into the food chain.

The location of a heavy industrial operation immediately next to existing and planned residential housing, schools and food businesses, and operating 24-hrs/day, 7day/week is not appropriate and conflicts with the intentions of the Waipa District Plan and Growth Strategy for the community. Te Awamutu will need to import almost all of the material for this facility from outside of the district.

This is not a proposal for the benefit of the community. There will be significant additional traffic in a residential area, adding to air pollution and impacting those who are old, very young and immunocompromised. It will change the nature of the community from a quiet residential street to an unsafe and busy thoroughfare of trucks at all hours of the day and night

I wish (or do not wish) to be heard in support of my submission.

- // I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- // I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/~~do not request~~*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 1/10/23 Contactperson: Alison Wardle
(name and designation, if applicant)

Postal address: _____
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Submission on a Notified Resource Consent Application



Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4), Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

All of application

My submission is:

Support parts or all of [] Oppose parts or all of [x] are neutral parts or all of [] include—

- the reasons for your views.

Too much pollution, POISON, NOISE
TOO CLOSE TO CIVILISATION

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Decline all application


I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission (this means that you will speak at the hearing)
I do not wish to be heard in support of my submission (this means that you will not be advised of the date of the hearing and will not speak at the hearing)
If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant. (this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter:  _____
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/23 Contact person: Michael Weed
(name and designation, if applicant)

Postal address: 64 Wallara Terrace, Te Awamutu, 3800
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

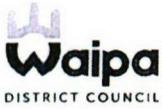
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Submission on a Notified Resource Consent Application



Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4), Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

all of application

My submission is:

Support parts or all of include— Oppose parts or all of are neutral parts or all of

the reasons for your views.

NOISE, Pollution, POLSON

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

decline application

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission (this means that you will speak at the hearing)
I do not wish to be heard in support of my submission (this means that you will not be advised of the date of the hearing and will not speak at the hearing)
If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant. (this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: Lisa Weed
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/23 Contact person: Lisa Weed
(name and designation, if applicant)

Postal address: 64 Wallace Terrace, Te Awamutu, 3800
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

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If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

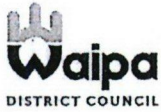
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- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
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Submission on a Notified Resource Consent Application



Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4), Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

Three horizontal lines for handwritten input.

My submission is:

Support parts or all of [] Oppose parts or all of [x] are neutral parts or all of [] include—

- the reasons for your views.

Handwritten text: Not suitable site Wright in town. Odor pollution, Truck traffic, Noise.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Three horizontal lines for handwritten input.

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission (this means that you will speak at the hearing)
I do not wish to be heard in support of my submission (this means that you will not be advised of the date of the hearing and will not speak at the hearing)
If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant. (this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: S.W. Waugh
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: _____ Contact person: Susan Waugh
(name and designation, if applicant)

Postal address: _____
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

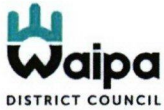
If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I **am not*** a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I **am** directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

Publicly misleading and factually incorrect information in my opinion. The adverse affects on the environment and the community. The impact it will also have on resources and infrastructure that serves the community.

My submission is:

Oppose parts or all of

include—

- *the reasons for your views.*

Please refer to attached written submission (Addendum A)

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

For the Resource Consent Application in its totality to be **DECLINED**.

I do not wish to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission**
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: Hayden Woods
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 14/09/2023 Contact person: Hayden Woods
(name and designation, if applicant)

Postal address: 1/232 Rewi Street, Te Awamutu 3800
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

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- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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ADDENDUM A: WAIPA DISTRICT COUNCIL –

SUBMISSION on WASTE INCINERATION PLANT:

Reference: WDC REF: LU/0323/21

Submission Email: submissions@waipadc.govt.nz

'Ref: LU/0323/21 Te Awamutu Waste Incineration Plant; 401 Racecourse Road, Te Awamutu'

Applicants Email: richard.falconer@terrargroup.co.nz

Name of Submitter: Hayden Woods

Address of Submitter: 1/232 Rewi Street, Te Awamutu 3800

Phone: [REDACTED]

Email: [REDACTED]

REASONS or POINTS of CONCERN:

Points of Concern are as follows;

POINT of CONCERN 1:

It is rumoured that the facility will power 15,000 homes or the whole of Te Awamutu during summer – HOW EXACTLY as this defies logic, or common sense?

Yes, there are high incineration temperatures of approximately 800 – 850 degrees Celsius.

800 degrees Celsius (approx. a 1/5 of the Sun's temperature).

Burn Temperatures;

Paper/ Cardboard 430 degrees Celsius

(can it sustain a burn, or merely flash burn where paper can have flashes of 1000 degree burns for seconds or minutes, note sustained)

Wood 600 degrees Celsius (we don't recycle wood)

Concrete/ Steel (we don't recycle these materials)

This will require a considerable amount of energy to maintain, just where will this energy come from?

It is anticipated that it will be drawn from our already fragile national electricity grid.

Does our grid have that much spare capacity, especially when central government is forcing the need for everyone to have electric vehicles, and households to have energy hungry heat pumps.

Therefore, to maintain a 800 – 850 degree Celsius temperature burn, it is assumed, based on no other feasible power source being available, the plant will be drawing a HUGE amount of energy out of our local power grid– the question is even with GROWTH can this be sustained, and with the mounting pressure to all have electric vehicles and households to have heat pumps – can the electric grid cope, or is rolling blackouts going to become the regular norm for Waipa?

As for the so-called RUMOUR, energy created by incinerating waste will power homes, it is in my opinion unfeasible, as minimal energy will COME FROM THE BURNING or BREAKING DOWN of CONCRETE & STEEL (quoted as being materials being incinerated – so where are they getting this? As we as residents don't currently recycle such), as these materials don't burn, they merely change their physical state under temperature. Nor, in my opinion, TIMBER or CARDBOARD/ PAPER will generate sufficient energy over and above the input energy required to heat the incinerators in the first instance to be considered surplus to go towards powering homes.

Having contacted the Pfaffenau Plant regarding this issue, they have never got back to me having put to them the above.

Therefore, it can only be deduced that the so-called powering of homes comes from the RECOVERING of energy inputted to heat the incinerators in the first instance. Therefore, the district is LOSING energy, having taking it from our power grid, but only recovering a percentage of it through the waste process.

This is most certainly not an energy sustainable model, merely an expensive way to reduce the waste footprint using the guise of being environmentally and energy friendly.

Where are the environmental and energy conscious advocates on Council?

POINT of CONCERN 2:

(Reference: Te Awamutu News; Page 3 "Toxic' trash claim rejected')

Again, it is rumoured that no pollutants will be released from the facility, that will be located smack bang in our township, adjacent to; Residences, a Junior School, a Tertiary institution, a College, and a Dairy Factory.

The Te Awamutu News article quotes;

'.....high incineration temperatures destroyed a number of pollutants.....'

The words to focus on here is 'a number', it does not say ALL pollutants will be destroyed, so what pollutants get released into our surrounding air, and what impact this has on the health, safety, and wellbeing of those above mentioned.

CONCRETE and STEEL, both contain high acidic and toxic by-products that DO NOT disappear, or destroyed in its totality as some would imply, there is a conversion process where many of the toxic elements convert from a solid form either into liquid, or gas state released into our surrounding air.

For example; particles are generated when metals heated above their melting point, vaporize and condense. Exposure to these fumes has been classified as carcinogenic to humans.

Even the Pfaffenau Plant, confirms that it releases substances into the atmosphere and environment, but they argue its within tolerable levels – the question is, who monitors these levels and ensures that it is within tolerable, safe levels, especially in Waipa's Situation, having the plant smack BANG in the town's limits close to the above mentioned, and what effect this will have over time on the health, safety and well-being of those.

Regardless, of what is considered within SAFE LEVELS, I am confident there will be either solids, liquids, or gases that will be introduced to our environment that was not there already.

What does Mana Whenua think, does it show any concern for its PEOPLE, with neighbouring Junior School and Tertiary Institution?

What does the College think, does it show any concern for the well-being and health of its students?

What does the Dairy Factory think, will prevailing winds possibly send its way gases, and will this have any impact on production?

What does the residents think, potential gases being released, exposure to toxic liquids or solids, and CO2 emissions from heavy traffic movement?

Again, **where are the environmental and energy conscious advocates on Council?**

At this point, it is important to note and learn from the following examples;

'Du Pont' - <https://time.com/5737451/dark-waters-true-story-rob-bilott/>

'PG & E' - <https://abcnews.go.com/.../erin-brockovich-real.../story...>

Both ended in MAJOR 'billion dollar' class action law suits.

POINT of CONCERN 3:

There is also the issue of transportation of the material to and from the plant, and the impact this will have on the district.

It is quoted that the plant will process 150,000 tonnes of waste a year.

Therefore, if using a 7/8 axle truck with a capacity of 45 tonnes, this works out as being 3,333 truck movements in a single direction over a year at a MINIMUM.

Therefore, a total of 6,666 truck movements in both directions a year through a residential area (the number of truck movements will increase if having to use smaller sized trucks).

What impact does this have on the district with CO2 emissions, wear and tear on roading infrastructure, noise, general safety and well-being, with the following;

- A nearby Children Centre.
- A Racecourse.
- Residences.
- Schools.

Again, where are the environmental advocates on Council?

POINT of CONCERN 4:

It is also rumoured that the Waste Incineration Plant will be connected to our town water supply.

A fragile water supply that it is.

How many past Summers have water restrictions been forced upon us by Waipa District Council, because the district had to tolerate in my opinion neglected infrastructure that was burdened by growth forced upon the district again by our Council.

Whilst it maybe argued that an upgraded NOT new, Pukerimu Water Treatment Plant, will improve water delivery, the question here is for how long?

In 2035, Waipa's Consented Water Take is going to be considerably cut, placing extreme restrictions on its existing ratepayers, let alone the growth we keep hearing about.

Potable water is a finite commodity.

Placing another plant of similar size to the Dairy Factory which uses approx. 30 - 35% of the towns water supply.

What impact will this have on the future of Te Awamutu's Water Supply, isn't it time that residents have uninterrupted water to their households – this is what they pay for in a so-

called 'user pays' system. If Council can't supply, they have again failed to deliver in my opinion.

POINT of CONCERN 5:

RADIATION and CARCINOGENS are INVISIBLE and are KILLERS!

There is NO GUARANTEE that any filtration system will REMOVE all and STOP all toxins being released into the atmosphere from the material being incinerated.

Look at the DAMAGING issues and affects Germanys Waste Incineration Plants are causing or having on communities and the country as a whole.

<https://www.investigate-europe.eu/en/posts/burning-questions-remain-over-europes-waste-incinerators>

Also, NZ has NO STABLE power source. Look what this did to the glass kilns of Germany that require constant heating not dissimilar to the planned incinerators for the Waste Incineration Plant - the power cuts destroyed the kilns, that now need replacing at great cost – our region and electricity GRID cannot sustain such.

<https://www.cleanenergywire.org/news/eu-climate-ambitions-spell-trouble-electricity-burning-waste>

“It’s not like the garbage just disappears into thin air.”

The operator of the Helmstedt plant, [EEW](#) Energy from Waste, [praises](#) the facility as “energy for the region and protection for the environment.” The facility’s purification processes cleanse incineration’s fumes, which exit the smokestack as harmless smoke, according to [an EEW video](#).

But experts such as Trecroci say that despite the sophisticated filters and cleansing processes of a modern plant, the fumes exiting the smokestack contain significant amounts of nitrogen oxides, particulate matter and other noxious elements. A [long-term study](#) in the Netherlands revealed that a WtE plant near the harbor town of Harlingen emitted toxic emissions that passed into the bloodstreams of livestock.

CONCLUSION:

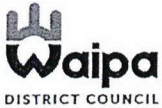
TERRITORIAL AUTHORITIES; LEARN FROM OTHERS MISTAKES – **DECLINE** THE RESOURCE CONSENT APPLICATION AND LOOK FOR A MORE VIABLE, SUSTAINABLE OPTION THAT IS ACUTALLY ENVIRONMENTALLY FIRENDLY – DON'T JUST BELIEVE WHAT YOU ARE TOLD OR PRESENTED – LOOK TO EUROPE, WHO ARE INCURRING ENDLESS ISSUES WITH WASTE INCINERATION PLANTS WITH NO ACTUAL LONG TERM BENEFIT TO CLIMATE CHANGE BUT COMING AT A MUCH GREATER COST TO THE PEOPLE BECAUSE OF THE PROPAGANDA!

I STRONGLY OBJECT to the erection of a Waste Incineration Plant within the town boundary of Te Awamutu, as I consider the negative impacts of the facility on the environment, our infrastructure, power grid, water supply, and the potential this has on the health, safety, and well-being of residents of the district far out way the need to have such.

Profit should not be a driving factor for such, as again the districts health, safety, and well-being should be paramount.

Consideration to have such, may be reviewed if an alternative site selection, outside of the township boundary away from the above-mentioned areas of concern and any possibility that prevailing winds may still consider it a possible environmental health hazard.

Submission on a Notified Resource Consent Application



Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

all of the application

My submission is:

Support parts or all of Oppose parts or all of are neutral parts or all of
include—

- the reasons for your views.

We need to protect our environment NOT jeopardise it. This will impact the value of houses in Te Awamutu therefore impact people's livelihoods.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Decline application

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: _____

Contact person: _____

(name and designation, if applicant)

Postal address: _____

(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

Environmental and health and safety impacts.

My submission is:

Support parts or all of **Oppose** parts or all of **are neutral** parts or all of

include—

- *the reasons for your views.*

Submission represents diverse views of staff.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

N/A.

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/2023 Contact person: Anna Greenhill, Head of Customer & Community Engagement
(name and designation, if applicant)

Postal address: P O Box 505, Te Awamutu
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

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If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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13 October 2023

Waipā District Council
Private Bag 2402
Te Awamutu 3840

By E-mail: submissions@waipadc.govt.nz

Cc: richard.falconer@terragroup.co.nz

Submission Re Waste to Energy plant LU-0323-21

Introduction

Waipā Networks is a locally owned Electricity Distribution Business based in Te Awamutu. We employ 95 staff from our Te Awamutu base with a mixture of onsite workers and those who predominantly work out in the field.

No Conflict of Interest

We acknowledge that our Company operates in the same industry as the proposed plant would operate in, including around 3.3MW of generation, and therefore there is potential for conflict of interest. However, this submission is made by Waipā Networks purely in our capacity as a local employer operating in Harrison Drive, Te Awamutu, approximately 250m from the northwestern boundary of the proposed development site. We also own a leased residential property in Racecourse Road approximately 175m from the proposed site.

Clarification of Appendix 23 "Letter of Support"

The application by Global Contracting Solutions Limited contains a November 2021 letter from Waipā Networks confirming the technical possibility of a connection to the electricity network (Refer Appendix 23 of application). We note, however, this has erroneously been listed by the applicant as a "Letter of Support" rather than an assessment of infrastructure capacity. The letter simply confirms that connection of a 20MW generation plant is possible subject to assessment of the technical and connection feasibility. It does not in itself support the application.

Staff Engagement

Given Waipā Networks close proximity to the proposed site and concerns being raised in the media by the general public we thought it pertinent to gauge staff support or opposition to the proposal and make a submission representing their collective views. Staff are also free to make individual submissions outside their capacity as an employee and representing their personal views only.

Engagement with staff was via an e-mail survey which received 24 responses. Although the majority (18) were overall opposed to the proposal, there were 4 who were neutral and 2 who supported it. This diversity of opinion, and in considering the majority of staff did not respond, means that this Waipā Networks submission is made as *neutral*.

Survey Results

The survey itself was relatively simple and designed to seek feedback on concerns already raised in the media around the environment and community impacts. There was also free form opportunity to provide additional feedback.

- 22 respondents were moderately or very concerned about the potential environmental impacts.
- 20 respondents were concerned about the potential impact on community health and safety.
- 13 respondents believed the plant would not be beneficial to Te Awamutu in the long run.
- Other comments raised included:
 - Opposition to the location near residential properties, rather than the concept itself.
 - The technology is unproven and therefore risky.
 - Increased traffic volumes.
 - Potential negative impact on “green” credentials for the town.
- One response also raised concerns around cultural, land use and flooding issues however they indicated they have made an individual submission and therefore we have not detailed these here.

Summary

As indicated earlier, Waipā Networks makes this submission as “neutral” solely due to the diversity of feedback from our staff regarding the application. The submission is made to ensure the concerns raised by staff during the engagement process are noted.

For any queries regarding this submission please contact Anna Greenhill, Head of Customer and Community Engagement.

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I /am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I ^{am not} ~~am~~ not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

See attached statement

My submission is:

Support parts or all of Oppose parts or all of are neutral parts or all of
include—

- *the reasons for your views.*

See attached statement

I seek the following decision from the consent authority:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I oppose this application. I want the Waipa District Council to decline this application.

wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

do not request

I ~~request/do not request~~*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

[Handwritten signature]

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 9/10/23

Contact person: Brian Winter

(name and designation, if applicant)

Postal address: 26A Walmsey St Kihikihi 3800

(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

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Brian Winter
26A Walmsley Street
Kihikihi
Te Awamutu 3800



Application number: LU/0323/21

My submission relates to the whole application. I oppose this application and I want the Waipa District Council to decline this application. I would like to be heard in support of my submission.

I am concerned about the negative environmental and economic impacts this incinerator will have on Te Awamutu and the surrounding area. Issues around Ash landfill and the inhalation of dioxins and nanoparticles are of particularly high concern, the effect this will have on people's long-term health as well as our primary sector.

Technology

New Zealand has no municipal waste incinerators and current ideas for similar incinerators have been called in. Te Awamutu should not be the testing ground for this technology, given that GCS has no history of building or operating an incinerator of this capacity. Furthermore, our legislation at central government level is not fit for purpose for and would need serious reform before any incinerators are built in the country. There is no clear regulation around operations, testing, accountability. Given that GCS has not met previous standards, the question is raised as to how they would meet expectations for this.

Cultural Impact

Iwi must fully give fully informed consent which I do not believe has been attained. This also goes against the idea of the ecological corridor linking Maungatautari and Pirongia. Furthermore, there is not cultural impact assessment.

Emissions

Dioxins that are produced by incinerator cause cancer, even at extremely low levels. These particles will be emitted into the air and settle on land and water. Dioxins bio-accumulate over time in fat and tissue. This means that expectant mothers could pass this on to their babies. Livestock will also be affected and the runoff will be passed through into milk and other products that we rely on to export. Currently, there is no assessment of land or water contamination in the application. The stormwater from this site will be discharged into the Mangapiko stream. All discharges will contain heavy metals. Zinc oxide from burning tyres is highly toxic to aquatic life. 23 tonnes of ash per day will be produced and will need to be landfilled. Highly contaminated wastewater will need to be stored. There is also no risk assessment in the event of a fire or explosion.

Land Use

The area is part of the Specialised Dairy Industrial Area. Any activity should be aligned with Fonterra's activities. Burning tyres and other waste next to a Dairy factory seems inappropriate. Further, this area is not zoned for industrial development in the Council's District Plan. This would also be

incompatible with the residential housing, schools and food enterprises that are located in the area. Current infrastructure will be under severe strain or not be able to cope with the influx of trucks.

Flooding

The site is on a floodplain and designated a High Risk Flood Zone. Because the building would be constructed below level, any flooding that would occur would impact Fonterra and local residents. Should flooding occur, will the incinerator be insured and is there a guarantee that locals would not pay for any clean up required from consequential flooding?

Climate Change

The incinerator is the antithesis of reducing climate impact as it will add 150kT of CO₂ per year. It will use non-renewable energy and relies on further waste being produced at that level to keep the facility in operation.

Waste

Most of the waste will be imported into Waipa, carried on 200 trucks per day which will put significant pressure on an already stressed infrastructure network. We do not know where this waste will come from. Recyclable material could also be burnt rather than recycled. The energy produced from burning a milk bottle is considerably less than recycling that same bottle. 35,058 tons of plastic will be included in this. There is also a question about how current waste contractors who manage waste and recycling will be impacted by this.

Health

There is no human health assessment. As previously outlined, dioxins and nanoparticles will be absorbed by people. There are direct links to cancer, miscarriages, fertility. In elderly and children, there is an increase in cardiovascular issues and asthma. Research in the Netherlands showed that dioxin output from waste incinerators could be responsible for contamination of cow milk and meat. Consequently, the production and sale of dairy products was prohibited for years. The incinerator will add to air pollution which could lead to an increase in premature deaths of residents. There is also no clear idea of how regular testing and maintenance of the facility will be to measure these particles.

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I ~~am~~/am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

My submission relates to the whole application.

My submission is:

Support parts or all of **Oppose** parts or all of **are neutral** parts or all of
include—

- the reasons for your views.

Please see attached document.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I oppose this application. I want the Waipa District Council to DECLINE this application.


I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

~~I request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 12/10/23 Contact person: Karla Watson
(name and designation, if applicant)

Postal address: 199 St Marys Avenue, Te Awamutu 3800
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991. You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority. If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840. If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz. If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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12/10/23

WDC REF: LU/0323/21

RC REF: APP143988

I am writing to oppose the application to develop a Waste Incineration Plant in Te Awamutu. This letter is specifically in regards to Global Contracting Solutions Ltd's application. I am requesting that this application for the Waste Incineration Plant be declined. This letter is directed to the Waipa District Council and the Waikato Regional Council.

To follow are the reasons I oppose this application.

Pollution and Health Issues:

The biggest issue with incineration is air and water pollution. Based on the wide range of materials to be incinerated at this site, there will be large numbers of chemical pollutants (likely beyond those recognised in the safety assessment). The applicant's own executive summary carried out by Terra Consultants states how dangerous these particulates are (pg 24, 4.9.1 to 4.9.8), agreeing with recent air pollution studies showing evidence that the PM_{2.5} particulates are 'having more significant impact on human health than PM₁₀. People most susceptible to the effects of particles includes the elderly, those with existing respiratory disease, those with cardiovascular disease, those with infections such as pneumonia and children. As Mr Brady notes evidence is emerging that health impacts derive primarily from PM_{2.5} not PM₁₀.'

The '24 hour cumulative effect PM_{2.5} – 20 µg m⁻³, compared to a NES maximum of 25' (pg 25 4.9.1), well, this is just going to increase the health issues that just do not need to happen.

According to air studies conducted in particulate matter and Nitrogen dioxide (NO₂), there are no safe levels of exposure - <https://www.atsjournals.org/doi/full/10.1164/rccm.202201-0160ED> and even a 1 ug/m³ increase in PM_{2.5} will lead to noticeable increases in health risks for respiratory diseases such as asthma - <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5285321/>.

In the spatial diagram Figure 28 on page 25, the yellow covers the racecourse – the worst affected area for the particulates to shower over and bioaccumulate – this area is the T13 residential for 420 homes (can be found on the Waipa District Council Growth Cells information, 14th March 2019) – it is outrageous that 401 Racecourse Road is being considered for this plant right next to a future residential area. The T13 area was zoned residential before this application, and the Racecourse Road site was not identified as an area for industrial development in the District Plan. The current "Specialised Dairy Industrial Area" designation means that the land use is intended to ensure that any activity there was aligned with Fonterra's activities. This does not appear to be the case as it is totally inappropriate to have the incinerator plant right next to the Dairy factory due to its toxic emissions.

There are 5 Early Childhood and learning institutions of approximately 1800 very young and school age children within 1km of the proposed site, this is an issue of major importance as their health is at risk. The creation of persistent organic pollutants (e.g. the dioxins mentioned above), will also have high risk for bioaccumulation. This is not just from the air, but from when the particulates settle on the ground where school students utilise their sports fields and farm animals eat – it will then become part of our food chain.

There is no assessment of land contamination included in the application. International research shows that the land surrounding incinerators can be extensively contaminated with heavy metals,

microplastics, dioxins and other toxic emissions like zinc oxide which comes from burning tyres and is very toxic to aquatic life, hence my concern with the T13 residential growth cell and existing properties. This also means that the run off from the surrounding land and stormwater from the site will go into the Mangapiko stream. The water is likely to be contaminated with heavy metals and dioxin. Filtration systems and settlement ponds do not eliminate all the toxic products meaning these will make their way into the waterways, and again our food chain.

I read in the reports that the predicted noise level is only just above the decibel limit, but noise always carries further than expected, and plants/factory noise levels are always higher than predicted or expected – and this plant is going to be under 24hr operation. Sound travels very far at nighttime in Te Awamutu as we are surrounded by hills so it bounces off and can be a lot louder. I live on St Marys avenue which is across Anchor Park to get to the Dairy Factory – I can hear the steam coming out of those vents when they do a clean – I can only imagine how loud living across the road from it must be. And there is often a milk powder smell in the air which is not nice. The odour and dust levels have not been adequately assessed for this incinerator plant either - the burning of 35,000 tonnes of tyres will emit cyanide, carbon monoxide, sulfur dioxide and products of butadiene and styrene. This will fill the town with an unbelievable stench.

The ash produced from the incinerator – 23 tones/day – this is toxic ash that needs to be landfilled as it contains heavy metals, microplastics and dioxins. Where is that going to go? That means even more trucks on the road to remove all the waste produced as well as creating more issues with landfill.

Water and Flooding:

The application says the plant will use 170m³ a day – that's 170,000L of our towns water a day to run this plant!? We are a small town and cannot afford to have that much of a precious resource used every day. What happens if we are low on water during the summer? What guarantees are in place to prevent that from happening? And then what if it the town supply does run out, or the rivers get too low due to a drought? What happens then? I do not believe this is a sustainable option for Te Awamutu's water supply. Also, the whole area is actually a floodplain – most of the proposed site is designated a High Risk Flood Zone. The river has been straightened and narrowed over time to enable development; this is now considered one of the major causes of flooding. Allowing rivers the ability to spread to accommodate severe rainfall events in the future protects infrastructure, business and housing from inundation. The incinerator buildings would increase flooding spread to the Fonterra factory and houses on Factory Road, numbers 331-467. There is also an insurance risk – insurance companies are warning New Zealanders not to build on floodplains due to climate change. The incinerator may become uninsurable, and the community would be left with the clean up bill.

Traffic:

The volume of traffic that would be created coming into Te Awamutu from all over the region to bring the rubbish into Racecourse road from 7am -5pm 6 days a week and 8am to 5pm on Sundays and public holidays. That means there will be constant truck noise on this road. (this is 185 vehicle movements which is equivalent to 1,360 cars!) The added road dirt, noise and exhaust fumes is going to make living in the area, especially Racecourse road very undesirable (especially if children want to play outside in their backyard). I do not believe the roads are capable of handling all this excess traffic either. I travel to and from Hamilton every week day and the amount of pot holes that appear each week is unbelievable as it is, so another 185 vehicle movements is not going to make that issue any better. As explained earlier, there are several schools, early childhood centres and many

residential houses on Racecourse road which means there are health and safety concerns for these children and residents living so close, but also for the wider community of Te Awamutu . This could potentially be even more vehicle movements than stated as there is a proposed 'education centre and Café' for people to come to with 'parking for buses.' (The original proposal contained 378 vehicle movements which is equivalent to 2,890 cars, but the applicant has since purchased 2 properties on Racecourse road allowing the assessment to be revised.)

Ultimately, this is an untested technology and Te Awamutu does not want to be a testing ground. Currently New Zealand does not have any municipal solid waste (MSW) incinerators. The incinerators that were in operation around 2000 have all closed. Many of them were a significant source of dioxin contamination. The similar larger proposal for a waste to energy incinerator in Waimate, South Canterbury has been "called in" by the Minister for the Environment partly because this is new technology with national implications.

Lastly, this type of waste to energy concept is quite the opposite of a 'green' project and is not the way to achieve our goals. Instead of encouraging a reduction in consumption, waste to energy plants reward the production of waste. They are reliant on it; this plant would need 480 tonnes – that's *480 tonnes of waste per day* to operate properly. In a time where we desperately need to reduce the amount we produce (for example, plastic production continues to increase exponentially), this "solution" will only further contribute to the wasteful habits that got us here in the first place. Instead, we should be pushing for solutions that encourage a circular economy and/or less waste production. An incinerator is not the answer for the Te Awamutu/Waipā area.

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Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am
 I am not directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

The entire application

My submission is:

Support parts or all of **Oppose** parts or all of **are neutral** parts or all of
include—

• the reasons for your views.

Location, Pollution, Health effects

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the entire application

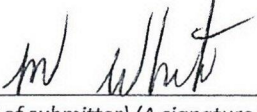
I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
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- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 12/10/23 Contact person: MARY WHITE
(name and designation, if applicant)

Postal address: 50 Mangahoe ST Te Awamutu
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

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The specific parts of the application that my submission relates to are:

The entire application

My submission is:

Support parts or all of [] Oppose parts or all of [x] are neutral parts or all of []

include— the reasons for your views.

To close to Town
Pollution general effects on health

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the entire application


I wish (or do not wish) to be heard in support of my submission.

- [x] I do wish to be heard in support of my submission (this means that you will speak at the hearing)
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**SUBMISSION ON PUBLICLY NOTIFIED APPLICATION FOR RESOURCE CONSENT BY
GLOBAL CONTRACTING SOLUTIONS LTD**

Resource Management Act 1991 (RMA)

To: Waipa District Council (submissions@waipadc.govt.nz)
Name of Submitter: Waikato Thoroughbred Racing Incorporated
Submission on: This is a submission on a publicly notified application by Global Contracting Solutions Ltd for a resource consent to construct and operate plant to generate power through combustion of refuse derived fuel on a site at 401 Racecourse Road, Te Awamutu.

1 Introduction

- 1.1 Waikato Thoroughbred Racing Incorporated (**WTR**) was formed following a recent merger of the Waipa Racing Club, the Cambridge Jockey Club and the Waikato Racing Club. WTR is the owner and operator of the Waipa Racecourse, which immediately adjoins the application site, as well as the Cambridge Racecourse and the Te Rapa Racecourse in Hamilton. The Waipa Racecourse is predominantly now operated as a horse training and stabling facility. Approximately 120 horses train at the racecourse, around half of which are currently stabled on the racecourse site. Approximately 5-7 meetings are currently held at the racecourse per year.
- 1.2 Following the recent merger, WTR has committed to preparing a venues and facilities plan within the next 2 years which will include consideration of the future of the Waipa Racecourse site. WTR is aware of the Residential zoning of the racecourse site under the Operative Waipa District Plan (**ODP**). The racecourse site is identified as Growth Cell T13 in the ODP and is referred to as having a capacity of approximately 420 dwellings. The ODP enables development of Growth Cell T13 immediately and anticipates this occurring before 2035.¹
- 1.3 In terms of the resource consent application by Global Contracting Services Ltd (**the Applicant**), the Waipa Racecourse boundary adjoins the proposed main access into the site and a proposed car parking area for staff and visitors. The boundary is also within approximately 35m of the proposed visitor centre building and 80m of the main building which will house the furnace and boilers and be up to 35m high (plus 38m high stacks).

2 The specific provisions of the application that my submission relates to are:

- 2.1 This submission relates to the entire application. WTR's interest in the application concerns the actual and potential adverse effects of the proposed plant on future residential activities and existing equine activities at the Waipa Racecourse.

¹ ODP, Appendix S1 – Future Growth Cells.

3 My submission is:

- 3.1 WTR opposes the application in full. WTR's concerns and reasons for opposing the application are set out below.

Incorrect and Unproven Assumptions Regarding Future Development Setbacks on the Racecourse Site

- 3.2 The Assessment of Environmental Effects (**AEE**), and many of the specialist assessments which are included with the application, rely on the incorrect and unproven assumption that future residential activities on the racecourse site will be setback a substantial distance (at least 50m-100m) from the boundary of the application site and that a structure plan will be required to be prepared for the racecourse site prior to subdivision and development occurring. The racecourse site is zoned Residential under the ODP and is capable of being developed at any time without going through a structure plan or plan change process. Residential development on the racecourse site is permitted up to 2m from the site boundary under the ODP (Rule 2.4.2.5).
- 3.3 The implication of this assumption by the Applicant is that the application seeks to transfer responsibility for mitigating adverse effects generated by the proposed activities to the future developer of the racecourse site, rather than managing adverse effects within the application site boundaries. This is unreasonable and is not supported by the ODP or any other relevant planning policy. It would sterilise the development potential of a significant part of Growth Cell T13 which would result in inefficient use of Residential zoned land and reduced future housing supply for Te Awamutu.
- 3.4 As a result, parts of the Applicant's assessments of the environmental effects of the proposed activity are flawed and incomplete.
- 3.5 While the Industrial zoning enables some development of the application site to occur, the proposal involves infringements of several standards in the ODP which are intended to manage the adverse effects of industrial activities at the interface with residential areas to protect residential amenity. Those standards include maximum building height, noise limits and landscaping.

Visual and Landscape Effects

- 3.6 WTR considers that the adverse visual and landscape effects of the proposed activities are potentially significant and will be more than minor. The application site is poorly suited for the proposed activities from a visual and landscape perspective and incompatible with future residential development which is planned and envisaged for the adjoining racecourse site under the ODP.
- 3.7 The Applicant has provided a Visual and Landscape Assessment (**VLA**) as part of supplementary information following lodgement of the application. Given the nature of the proposed activities, it is surprising that a VLA was not originally submitted as part of the application. Notwithstanding this, WTR has significant concerns with the visual and landscape effects of the proposal, including:
- (a) Only one view location within the racecourse site has been identified and considered in the VLA. That view location, referred to as VL1, is near the grandstand which is approximately 500m from the application site so it is not representative of nearer view locations within the racecourse site. The VLA concludes that there will be 'low-moderate' effects from this distant location once mitigation has become established.
- (b) The VLA recognises that the application site's ability to visually absorb the type of development expected is 'poor' adjacent to the site.

- (c) The VLA sets out that the ratings that are expressed in the determination of visual effects are reflective of the portion of the proposed development that exceeds the 20m permitted maximum height. In adopting this approach, the VLA relies on a 'permitted baseline' to disregard the effects of buildings up to 20m in height on the application site. The further information provided by the Applicant confirms that a large part of the site is within a High Risk Flood Zone (100 year flood level) where development is a Non-Complying Activity under Rule 15.4.2.15 of the ODP. No planning analysis has been provided in the AEE to establish a 'permitted baseline', to justify the discretion under s104(2) of the RMA to apply it or to support the approach which has been taken in the VLA.
- (d) The VLA fails to adequately consider visual and landscape effects:
- i. Prior to mitigation becoming established, noting that the planting that is proposed will take many years to mature;
 - ii. From nearer view locations within the racecourse site than VL1; and
 - iii. In the context of the planned future environment including residential activities on the racecourse site.
- (e) Given all the above, WTR is surprised at the conclusion reached in the VLA that the visual and landscape effects of the proposal will be less than minor. Furthermore, this conclusion is contrary to other parts of the VLA which refer to the effects being minor and contrary to a statement in the AEE which says that at a total height of 35m the visual effect of the furnace hall could be ventured as 'significant'.

Noise Effects

- 3.8 WTR considers that the adverse noise effects of the proposed activities are potentially significant and will be more than minor. The application site is poorly suited for the proposed activities from a noise perspective and incompatible with future residential development which is planned and envisaged for the adjoining racecourse site under the ODP.
- 3.9 The Acoustic Assessment which is provided with the application predicts noise levels from the proposed activities at a point which is 50m inside the racecourse site boundary, rather than at the site boundary. Although further information has been provided by the Applicant's acoustic consultant which predicts noise levels from the proposed activities nearer to the boundary of the racecourse site, that assessment is understood to be 3.5m inside the racecourse site boundary rather than at the boundary as required by Rule 7.4.2.18 of the ODP. Despite this, the further information confirms that the daytime and night-time L_{Aeq} noise levels will not comply with the ODP noise limits at the adopted point of 3.5m inside the racecourse boundary. The further information does not state what the L_{max} noise level is predicted to be or whether it will comply with the relevant limit in the ODP. The application therefore fails to establish the degree of non-compliance that will exist with the ODP noise limits.
- 3.10 Furthermore, the application fails to include any assessment of the actual and potential noise effects of the non-compliances with the ODP noise limits on the racecourse site, including adverse effects on future residential activities which are enabled by the racecourse site's Residential zoning and cumulative effects of noise from the proposed activities in combination with other activities that form part of the existing environment.
- 3.11 The conclusion in the AEE that noise effects will be less than minor is therefore based on incomplete information and assessment.

Air Quality Effects

- 3.12 WTR considers that the air quality effects of the proposed activities are potentially significant and will be more than minor. The application site is poorly suited for the proposed activities from an air quality perspective and incompatible with future residential development which is planned and envisaged for the adjoining racecourse site under the ODP.
- 3.13 The application explains that the proposed activities will involve discharges of particulate matter, sulphur dioxide, hydrogen chloride, hydrogen fluoride, nitrogen oxide, mercury, dioxins and furans and carbon monoxide to air as a result of the processes associated with burning of refuse to generate electricity. WTR has significant concerns with the air quality effects of the proposal, including:
- (a) There may be real or perceived air quality risks if the proposed plant does not perform as intended (recognising that the application acknowledges the proposed activities are novel in New Zealand), if maintenance is not carried out by the Applicant, if the plant malfunctions, if different refuse materials are burnt compared to what has been assumed/assessed in the application (which may be unintentional) or if there is a major incident such as a fire. The consequences of any of these occurrences is likely to be very high and unacceptable in terms of the health and wellbeing of the local community, including users and future residents of the racecourse site.
 - (b) The AEE refers to there being very little potential for odour discharges. This suggests that there is still some odour risk associated with the proposed activities. There could be significant and ongoing adverse effects on the local community, including users and future residents of the racecourse site, if odour discharges were to occur.
 - (c) There may be dust discharges from the operation of the proposed plant.
 - (d) Even if air discharges do comply with relevant standards, the strong opposition to this and other similar plants in New Zealand confirms that discharges from the plant will be of concern to much of the community. This, together with the risks referred to in (a) above, is likely to discourage many people from wanting to live on the racecourse site when it is developed in future, particularly given the site is adjacent to and directly downwind of the proposed plant. For these reasons, there are likely to be significant commercial implications for WTR if the application is granted.
 - (e) If the proposed plant were to be established, there is likely to be very little that could be done to remedy air quality issues if they were to subsequently arise. A precautionary approach should be taken given the high consequences due to the proximity of the application site to residential receivers, including the potential for approximately 420 dwellings at the racecourse site in the future.

Reverse Sensitivity Effects

- 3.14 Reverse sensitivity effects are likely to arise due to the adverse visual and landscape, noise, air quality, character and amenity effects of the proposed activities and their incompatibility with residential activities which are planned on the racecourse site under the ODP. This incompatibility is highlighted by the nature and extent of infringements of standards in the ODP which are intended to manage the adverse effects of industrial activities at the interface with residential areas to protect residential amenity. Those standards include maximum building height, noise limits and landscaping.
- 3.15 It is imperative that any activities that establish on the application site adequately manage adverse effects within the boundaries of the site to avoid, or at least minimise, the potential for reverse sensitivity effects to occur in future. The Applicant's proposal will not achieve that outcome.

Traffic Effects

- 3.16 WTR is concerned about the potential for conflict to occur between vehicle movements from the proposed activities on Racecourse Road (including heavy commercial vehicles) and future traffic movements (predominantly cars) associated with planned residential development of the racecourse site under the ODP. A better outcome would be achieved if access for industrial activities on the application site was provided to/from Factory Road to minimise potential conflicts between industrial and residential traffic. That outcome would also be more consistent with the zoning of the application site (given the proposed access is zoned Residential under the ODP) and with the application site's location within the Specialised Dairy Industrial Policy Area Overlay under the ODP which also covers the Fonterra dairy factory and other land to the west and south of the site.

Other Effects

- 3.17 WTR is concerned that inadequate consideration has been given by the Applicant to other actual and potential adverse effects of the proposed activities, including:
- (a) The proposed plant, which would be a 24-hour facility, is likely to require extensive lighting for operational and security purposes. The lighting is likely to result in adverse visual effects which have not been adequately considered as well as light spill and glare effects on future residential activities within the racecourse site. While the ODP includes controls on light spill from artificial lighting (Rule 20.4.2.2), no specialist lighting assessment has been provided with the application to confirm whether the applicable standards will be met and to assess lighting effects, including potential nuisance to the occupiers of adjoining sites.
 - (b) There has been inadequate consideration given to management of pests, including rats and mice which will invariably be attracted to the site and surrounding area due to the nature of the proposed activities. The response to the further information request says that preparation of a pest management plan is premature and can be imposed as a requirement of a condition of consent. That approach provides insufficient certainty regarding effects, methods and outcomes.
 - (c) Construction effects have been assessed in the application based on an assumption that construction of the proposed plant will occur prior to residential development of the racecourse site. WTR intends to make important decisions on the future of the Waipa Racecourse within the next 2 years. If the application for the proposed plant was to be granted, the resource consent would have a 5-year lapse period. Given the timing uncertainty, the application is incorrect to disregard the potential for construction activities to affect future residential activities on the racecourse site, including noise, vibration, dust and traffic.
 - (d) Pre-application meeting notes from Waipa District Council dated 12 November 2020 advised the Applicant to consider effects on equine activities at the racecourse. The AEE states that *"no impact on equestrian activity at the racecourse is anticipated during the period prior to conversion to residential use"*. However, no assessments have been provided in the application which consider effects on equine activities or which substantiate this statement. WTR is particularly concerned about potential effects during construction if equine activities are still occurring at the racecourse site when the proposed plant is built. Construction noise, vibration and dust could potentially have significant effects on the safety of horses, jockeys, trainers and other workers and visitors.

Site Selection and Suitability

- 3.18 The further information provided by the Applicant states that "... *the site was selected because of its relative isolation from potentially sensitive receivers*". This statement has no regard to the location of the application site and the proposed activities immediately adjacent to a Residential Zone which is planned to accommodate approximately 420 dwellings under the ODP. WTR considers the application site is unsuitable for the proposed activities and incompatible with future residential development which is planned and envisaged for the racecourse site.

Future Expansion

- 3.19 Several statements are made in the application which suggest the possibility of further expansion of the proposed activities in the future. This creates uncertainty for WTR, current and future neighbouring landowners and occupiers and the wider community. WTR is concerned at the possibility of expansion of the plant occurring in future via incremental resource consent processes.

Conflicting Information

- 3.20 The application contains conflicting information which needs to be clarified and considered in a consistent manner in the effects assessments, including the hours for heavy vehicle movements and differences between building heights and areas between the AEE and the VLA.

Peer Reviews

- 3.21 Section 92(2) of the RMA enables a consent authority to commission a peer review report on any matter relating to an application where the activity for which resource consent has been sought may have a significant adverse environmental effect and the Applicant agrees to the report being commissioned. WTR understands that Waipa District Council has commissioned peer review reports for noise effects and traffic effects and that Waikato Regional Council has commissioned a peer review report for air quality. WTR supports this approach but considers that landscape and visual effects may also be significant. It requests that Waipa District Council also considers commissioning a peer review report for that matter.

Resource Management Act 1991

- 3.22 WTR considers that the application:
- (a) Must be declined in accordance with section 104D of the RMA. As a Non-Complying Activity, the application must pass the 'gateway test' to be considered for approval. The application cannot meet this requirement because the effects on the environment will be more than minor and the application will be contrary to the objectives and policies of the ODP;
 - (b) Is inconsistent with the Waikato Regional Policy Statement; and
 - (c) Is contrary to the purpose and principles of the RMA. The application fails to achieve the sustainable management purpose of the Act (section 5), will not provide for the efficient use and development of natural and physical resources (section 7(b)), will not maintain or enhance amenity values (section 7(c)) and will not maintain or enhance the quality of the environment (section 7(f)).

4 I seek the following decision from the consent authority:

Decline the application.

- 5 I do wish to be heard in support of my submission.
- 6 I have served a copy of my submission on the applicant.
- 7 I could not gain an advantage in trade competition through this submission.

Signed by:



Andrew Castles (Chief Executive Officer)

Date: 13 October 2023

Address for Service:

Monocle Consulting Ltd
Panama Square
14 Garden Place
HAMILTON 3204

Contact Person:

Ben Inger

Telephone:

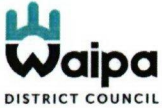
027 836 6507

Email:

ben@monocle.net.nz

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are:

My submission relates to all of the application. I am a health geographer (Senior Research Fellow) at the University of Waikato. I have 7 years of research experience, over 22 peer-reviewed publications and over 200 citations of my work. My area of expertise is spatial equity – the fair distribution of environmental “goods” and environmental “bads”.

My submission is:

Support parts or all of **Oppose** parts or all of **are neutral** parts or all of
include—

- *the reasons for your views.*

This proposal is a clear example of environmental racism. I have undertaken geospatial and demographic analysis (see Appendix I – Appendix IX) which indicates that particular groups will be disproportionately affected by the proposed incinerator. For instance, more than half of Māori in Waipā district reside within 10km of the proposed site. This is also true for close to 4-in-10 of Waipā residents aged 65 years and older, and over one-third of children in Waipā aged 15 years and younger. The location of the proposed incinerator targets the poorest communities in Waipā to an extreme degree. Over 90% of Waipā residents who live in neighbourhoods with high levels of socioeconomic deprivation also live within 10km of the proposed site; more than two-thirds live within 5km of the proposed site; and more than one quarter within 1km. In stark contrast the vast majority of the wealthiest residents of Waipā live outside these zones. In fact, there are no wealthy neighbourhoods within 1km of the proposed site. This may be a coincidence, but it is also an example of environmental racism and spatial inequity – when environmental “goods” and “bads” are not shared fairly.

Any health, environmental or social impacts caused by the proposed incinerator will therefore disproportionately impact these groups – which already experience an unfair burden of disease and poorer access to the social determinants of health and wellbeing. This proposal therefore threatens to exacerbate existing social, environmental and health inequalities

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I want the Waipā District Council to decline this application.

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

I wish (or do not wish) to be heard in support of my submission.

- I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.



Signature of submitter: _____
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

university of waikato

Date: 13/10/2023 Contact person: Jesse whitehead, Senior Research Fellow
(name and designation, if applicant)

Postal address: Private Bag 3105, Hamilton
(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991. You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority. If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840. If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz. If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Appendix I: Geospatial and demographic analysis of the spatial equity of impacts from the proposed incinerator site on the residents of Waipā District

Distance from Incinerator	Total pop	Māori (%)	Aged 15 years and under (%)	Aged 65 years and older (%)	European (%)	High Socioeconomic Deprivation (%) *	Low Socioeconomic Deprivation (%)**	Marae	Schools	Aged-care Facilities	Early Childhood Education Facilities
10km	19,257	4,389 (55.2%)	3,978 (36.2%)	3,648 (38.6%)	15,939 (34.1%)	10,686 (92.6%)	4,305 (13.2%)	3	12	6	24
5km	12,687	2,898 (36.5%)	2,517 (22.9%)	2,730 (28.9%)	10,425 (22.3%)	7,932 (68.7%)	489 (1.5%)	1	7	5	17
1km	4,209	1,005 (12.6%)	861 (7.8%)	783 (8.3%)	3,408 (7.3%)	3,108 (26.9%)	0 (0%)	1	3	1	5
Total Waipā Population	53,229	7,950 (100%)	10,995 (100%)	9,453 (100%)	46,713 (100%)	11,541 (100%)	32,715 (100%)	11	35	12	48

Data sources: Statistics New Zealand 2018 Census (SA2 level data); New Zealand Index of Socioeconomic Deprivation 2018 (NZDep18 - SA2 level data); Te Puni Kōkiri; Ministry of Education; Ministry of Health; Spatial analysis performed by Dr Jesse Whitehead in ArcGIS

* NZDep18 Quintiles 4 and 5

** NZDep18 Quintiles 1 and 2

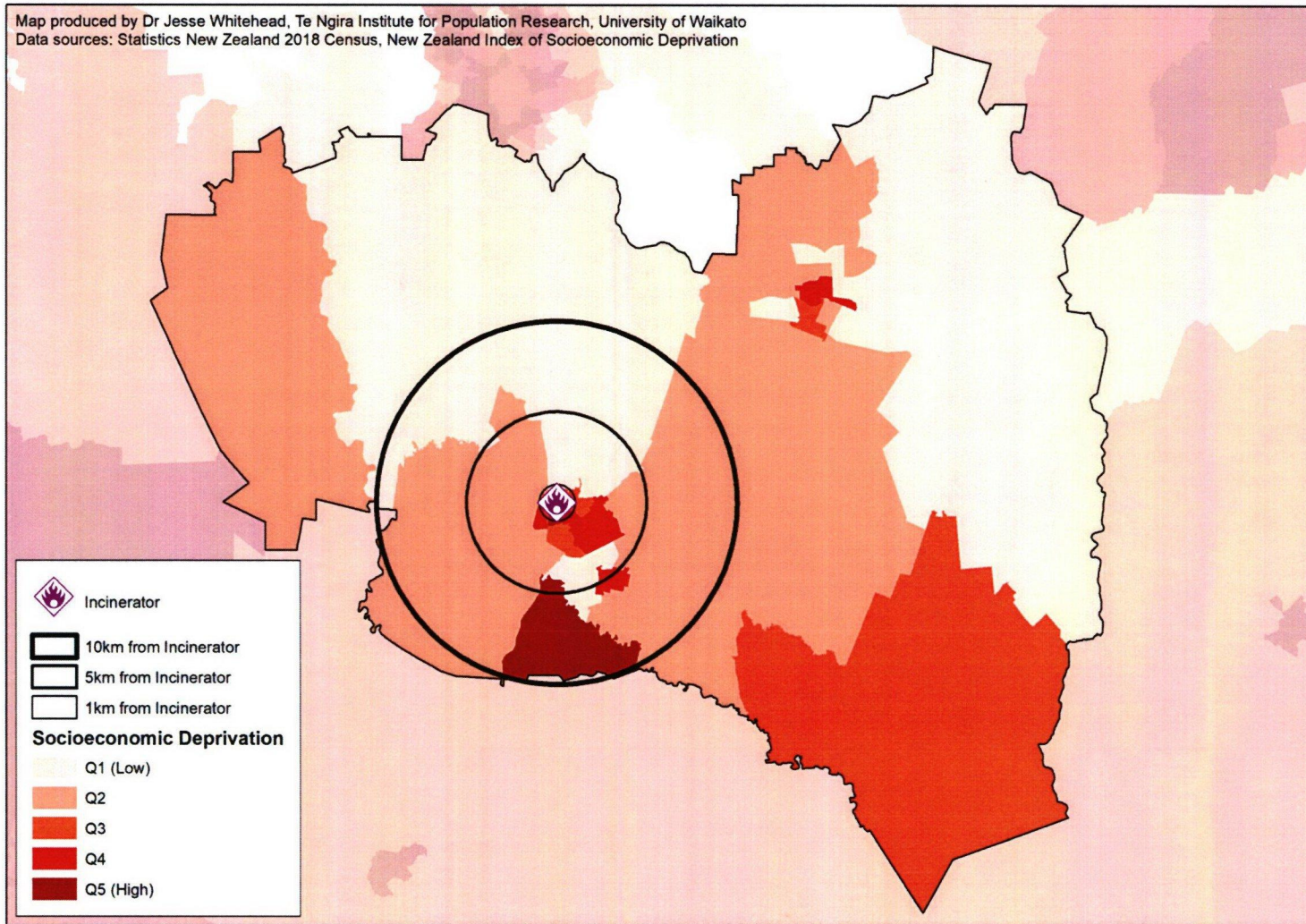
Submission on a Notified Resource Consent Application



Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix II: Socioeconomic profile of Waipā District – Impact on areas of high socioeconomic deprivation



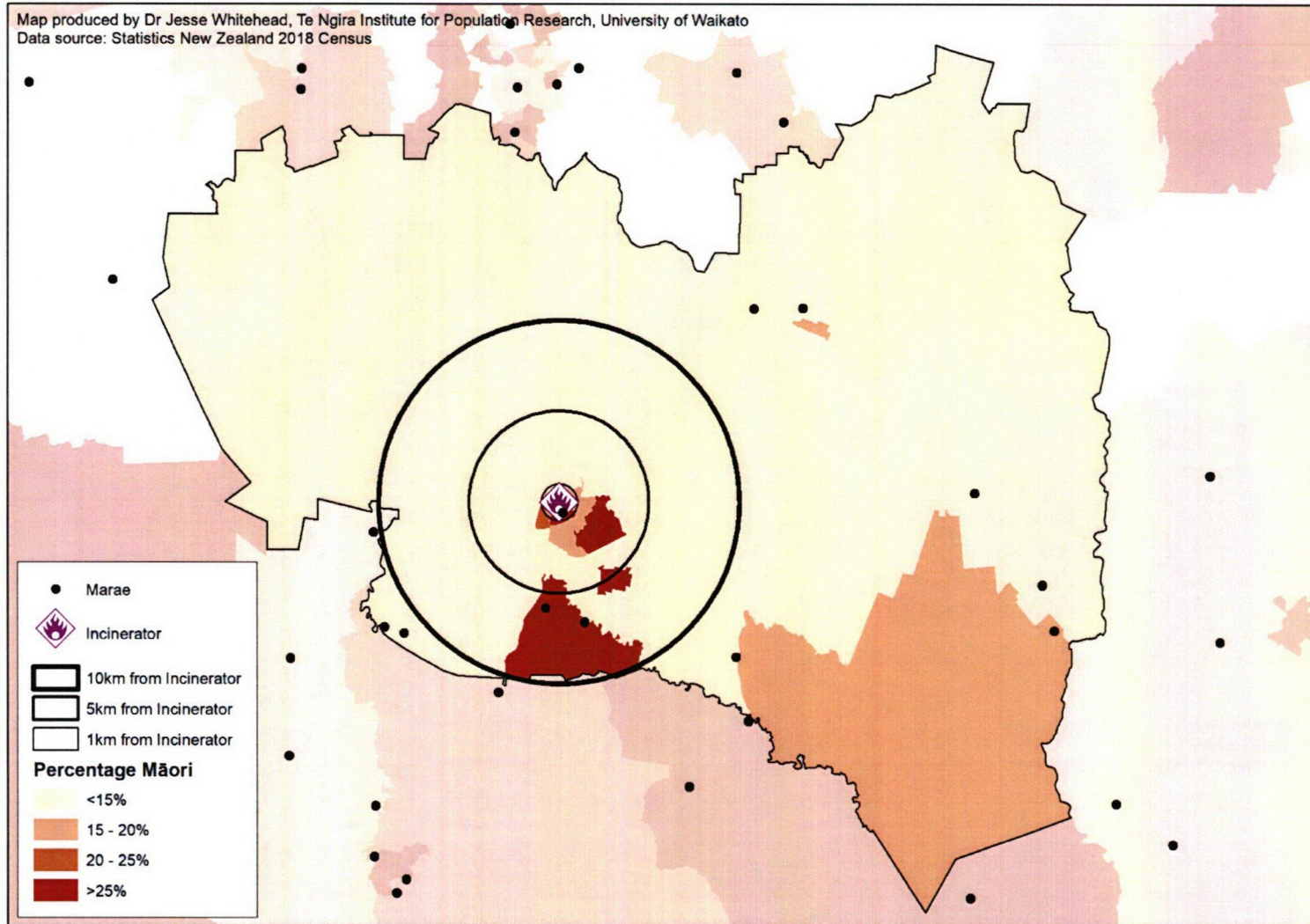
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Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix III: Ethnicity profile of Waipā District – Impact on areas with a high proportion of Māori residents



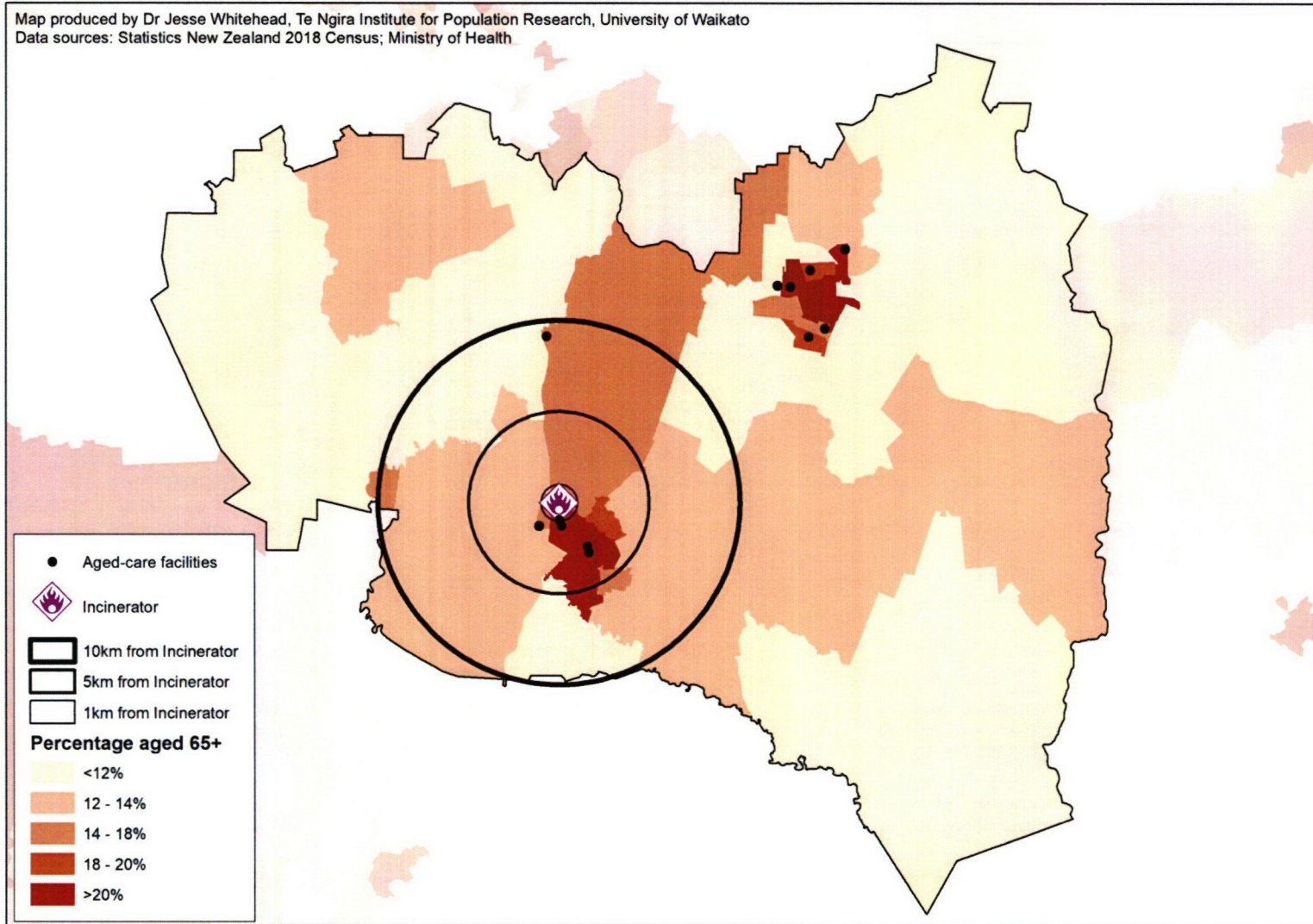
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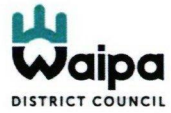
Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix IV: Age profile of Waipā District – Impact on areas with a high proportion of older residents



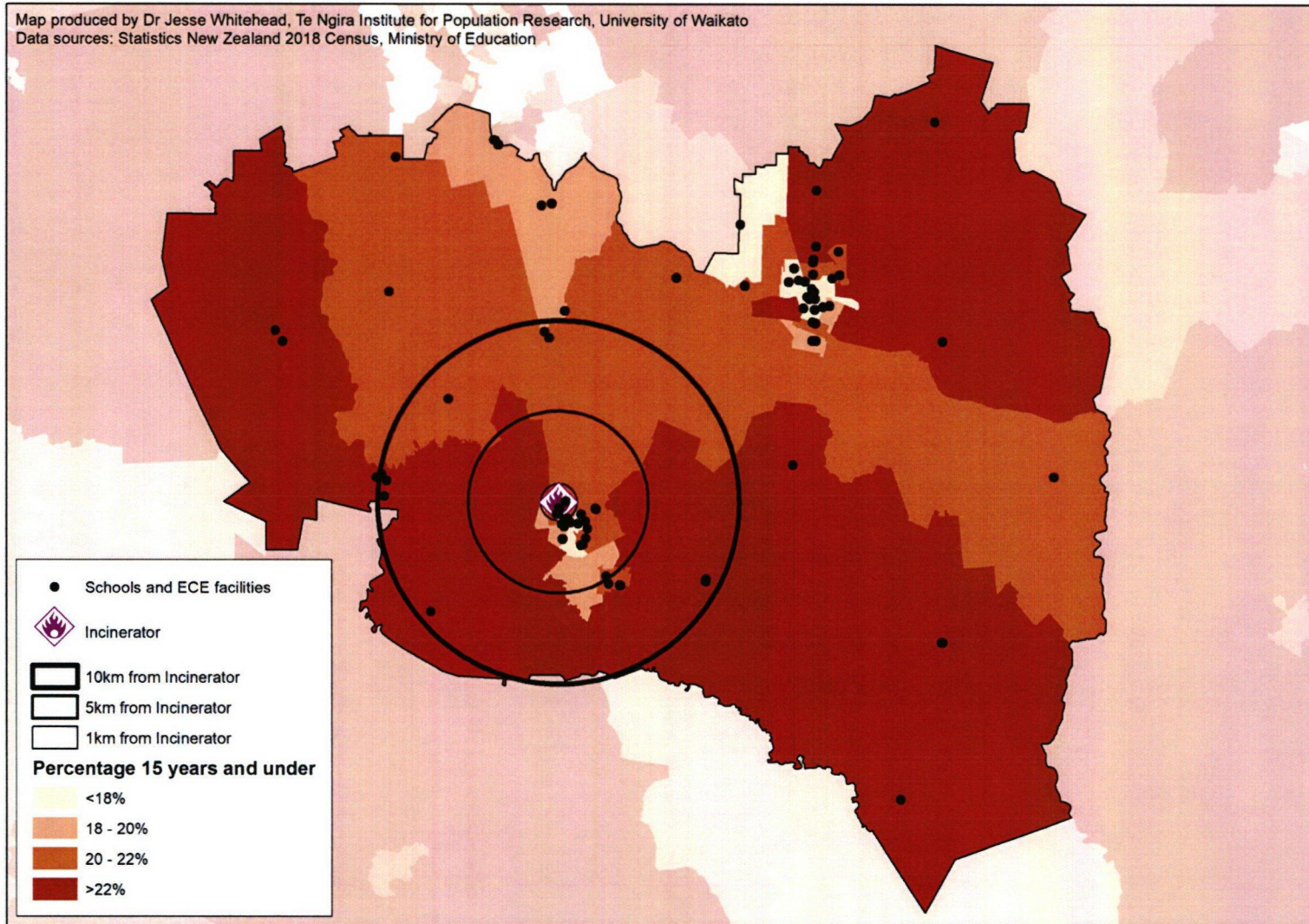
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Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix V: Age profile of Waipā District – Impact on areas with a high proportion of younger residents



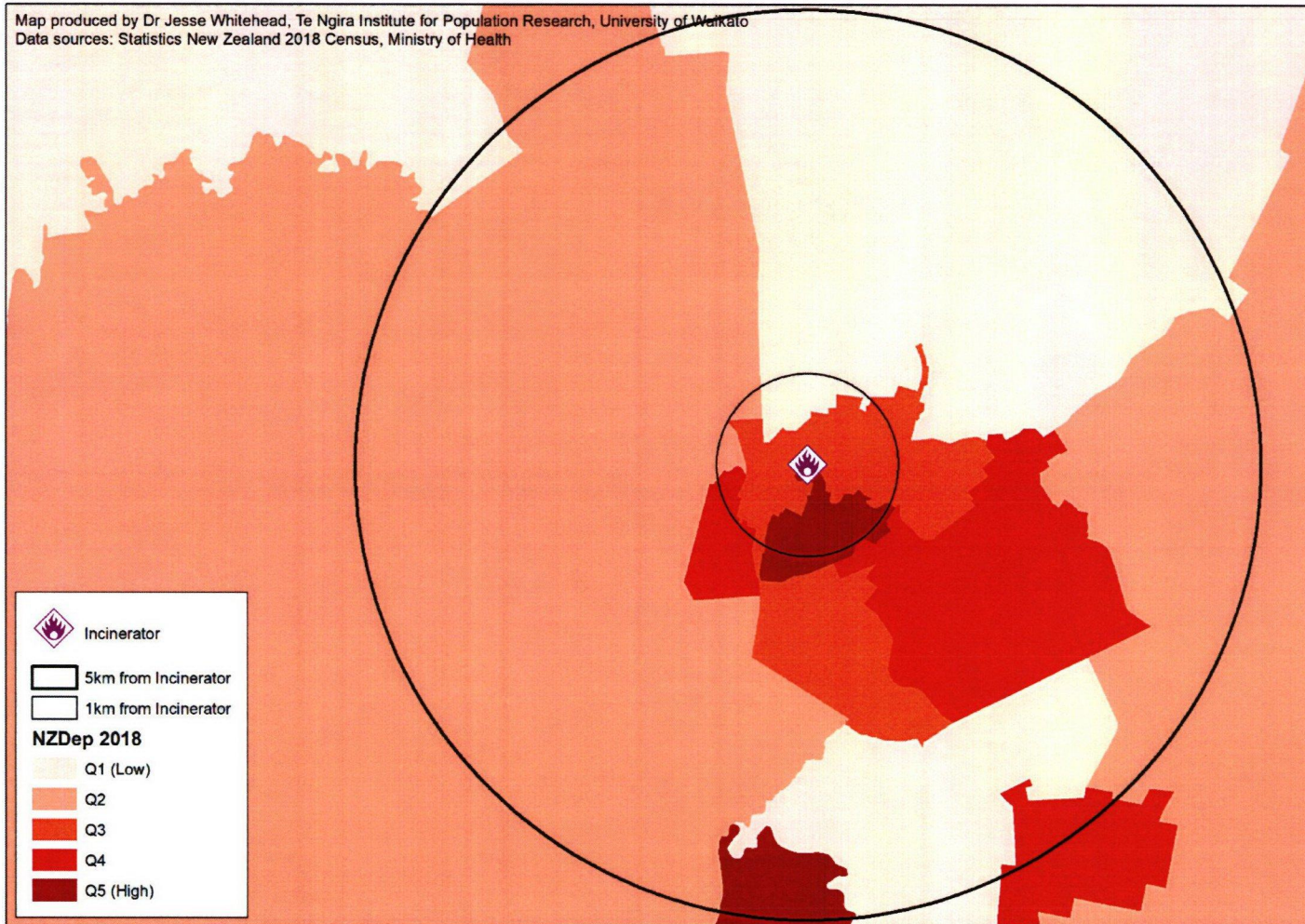
Submission on a Notified Resource Consent Application



Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix VI: Socioeconomic profile of Te Awamutu – Impact on areas of high socioeconomic deprivation



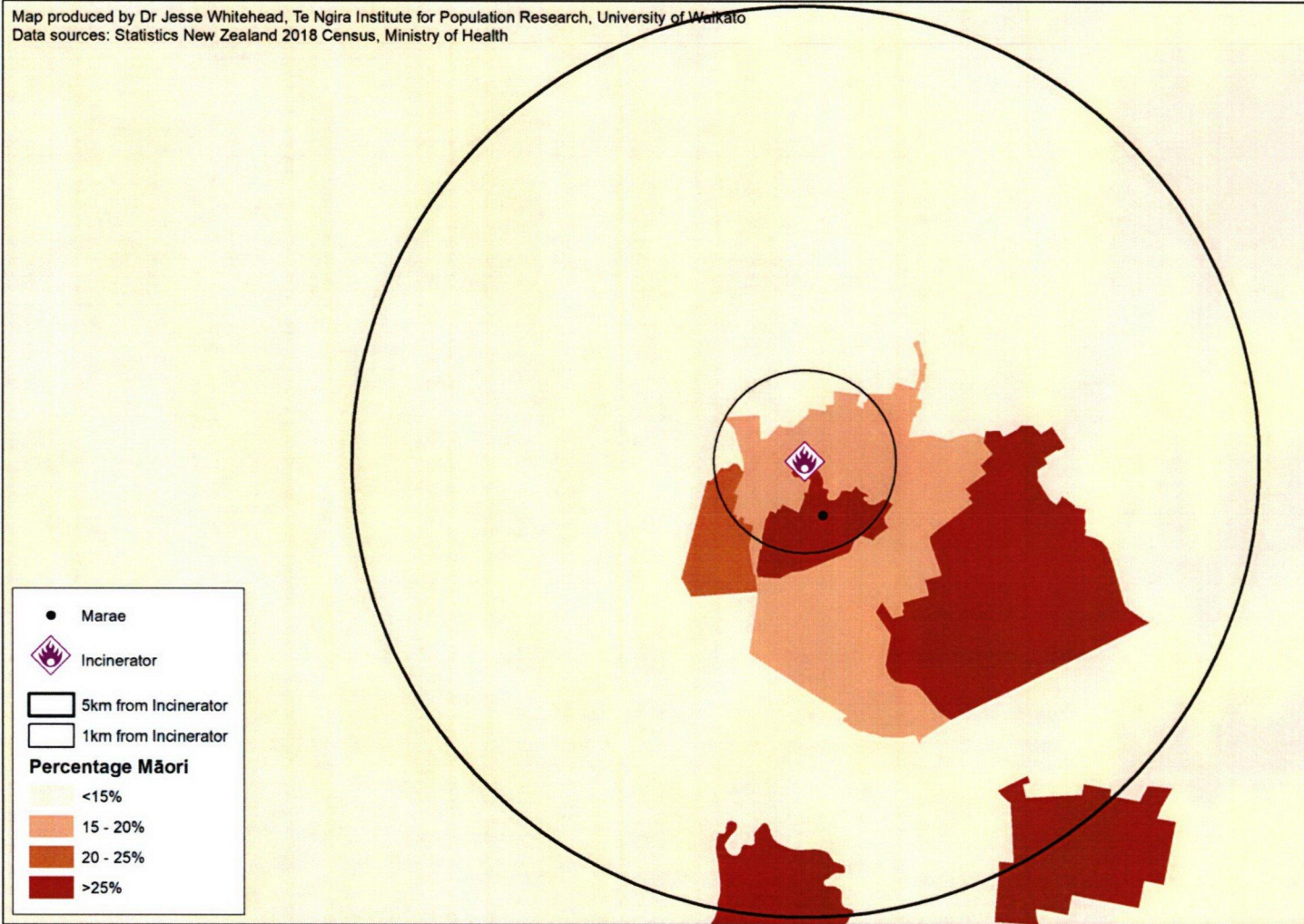
Submission on a Notified Resource Consent Application



Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix VII: Ethnicity profile of Te Awamutu – Impact on areas with a high proportion of Māori residents



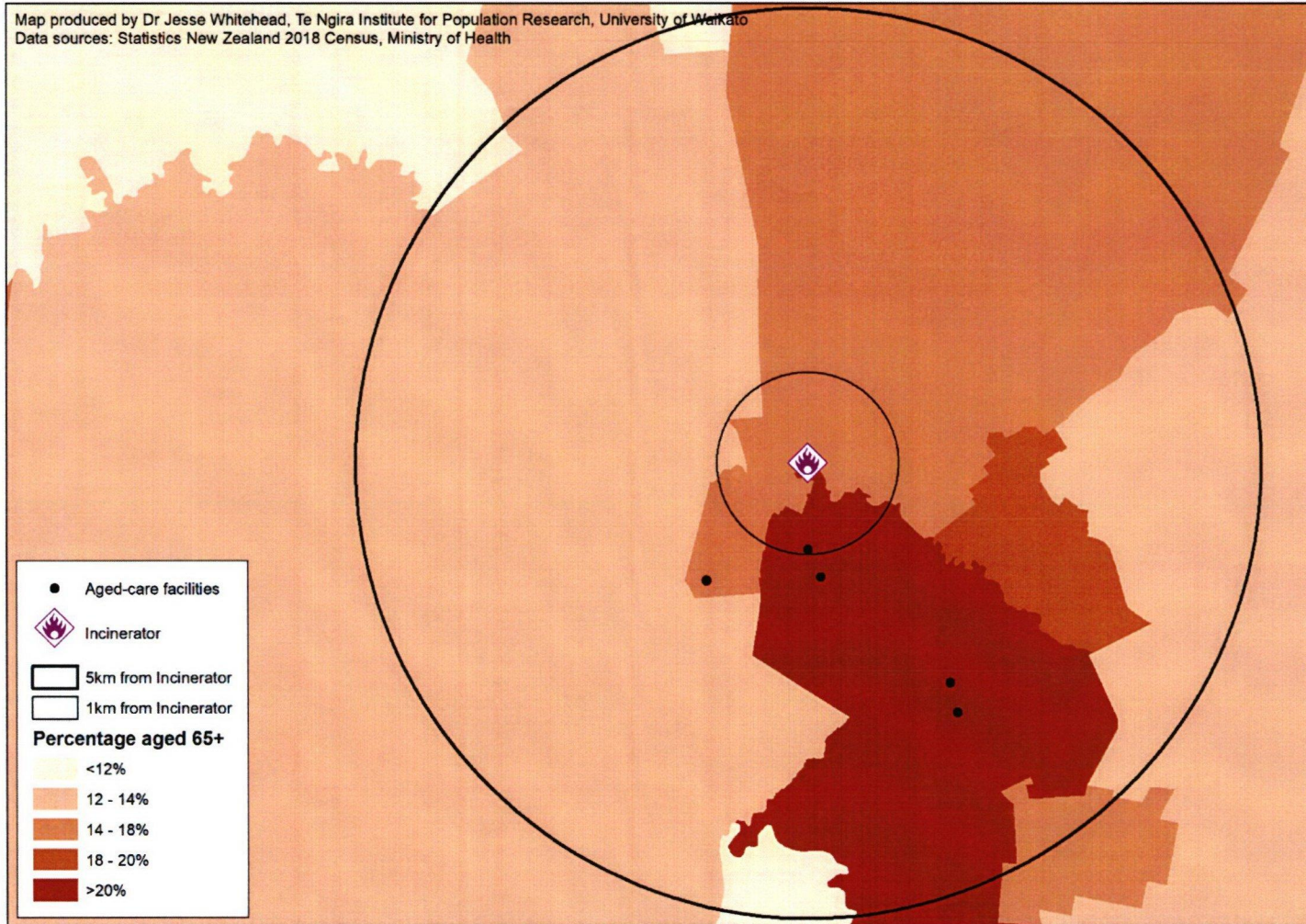
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Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix VIII: Age profile of Te Awamutu – Impact on areas with a high proportion of older residents



Submission on a Notified Resource Consent Application



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Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

Appendix IX: Age profile of Te Awamutu – Impact on areas with a high proportion of younger residents

