

**From:** Kaaren Rosser - EnviroNZ Corporate  
**Sent:** Wed, 23 Nov 2022 01:13:35 +0000  
**To:** District Plan  
**Subject:** Submission to PC21  
**Attachments:** Envirowaste Submission to District Plan PC21 - Spatial Plan Implementation.pdf

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Good afternoon,

Please find attached submission to Plan Change 21.

Kind regards

**Kaaren Rosser** | Environmental Planner | **EnviroNZ**

Please note working days are Monday, Tuesday and Thursday but don't hesitate to call if urgent on Wednesday or Friday.

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**ENVIROWASTE SERVICES LTD SUBMISSION ON THE MACKENZIE DISTRICT PLAN REVIEW – PLAN CHANGE 21 – SPATIAL PLAN IMPLEMENTATION**

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**Submitter Details:**

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3. Contact Person: Kaaren Rosser  
Environmental Planner  
  
Laurence Dolan  
Environmental Manager
4. Date of Submission: 23 November 2022

**Introduction:**

5. Enviro Waste Services Limited (EnviroWaste) is the second-largest solid and liquid waste management company in New Zealand.
6. EnviroWaste owns and operates significant portions of the Country's waste management infrastructure including landfills, waste treatment facilities, recycling facilities and waste transfer facilities. EnviroWaste also provides waste and recycling collection services for Councils, businesses and households throughout New Zealand.
7. EnviroWaste operates waste and recycling collection services within the Mackenzie District. It also operates resource recovery facilities at Fairlie, Twizel and Tekapo. The Twizel facility has a sorting facility for recyclables.
8. Class 4 controlled fill sites are operated at the resource recovery facilities managed by EnviroWaste at Twizel, Tekapo and Fairlie.



Figure 1: Twizel Resource Recovery Park at corner of Ostler Road and Hooker Crescent, Twizel

9. All refuse needing to go to landfill from the Mackenzie District is transported out of the district.
10. As a materials management and resource recovery company, EnviroWaste is committed to managing, recovering and processing waste streams to deliver sustainable outcomes.

#### Scope of Submission

11. EnviroWaste makes this submission on the Spatial Plan Implementation section of the District Plan changes (Plan Change 21) which is open for submission until 23 November 2022.
12. Specific comments have been detailed in the table at **Appendix 1**.

#### General Comments on the Draft District plan Changes

13. The proposed Residential zone standards do not propose any standards with respect to waste management. Where the density is proposed to 1 unit per 200m<sup>2</sup>, ensuring that there is sufficient space for bin collection on the verge and requiring sufficient on-site storage space is necessary to ensure that collection can be safely managed and a quality built environment outcome is achieved. EnviroWaste therefore propose a new standard in the Medium Density zone to address this issue. The standard will apply to dwellings, rather than multi-unit developments which are covered by the Solid Waste Bylaw. Site sizes in other zones are considered to be sufficiently large to accommodate bin storage and access without difficulty.
14. With respect to the industrial zone, there can be air quality issues where residential and industrial areas are located closely together. The Twizel industrial zone is located adjacent to residential zones for which increased density is possible under the Plan Change. The submitter has concerns with additional residential density adjacent to areas of Industrial zoning. It is contrary to Canterbury Air Regional Plan Policy 14.3.5, which provides that

encroachment of new development is avoided where new development is sensitive to existing activities discharging to air. Objective 5.2.1 of the Canterbury RPS states that development is located and designed so that it functions in a way that avoids conflicts between incompatible activities. Accordingly, increasing the density of the residential zones adjacent to the industrial zones needs to be carefully managed.

15. Management usually employs appropriate separation distances to avoid adverse effects of unintended odour and dust emissions from industrial facilities. Separation distances do not replace the need for good on-site controls of air discharges, but they are intended to minimise the effects of unintended or “residual” air emissions, which can occur from unplanned events, such as equipment failure, or particularly adverse weather conditions. Separation distances will therefore minimise reverse sensitivity effects. EnviroWaste therefore propose that the existing 20m setback in the Residential 3 zone be retained to ensure avoidance of the encroachment of sensitive activities next to areas where light industrial activities can be located.
  
16. The submitter wishes to be heard in support of this submission.

Signed for and on behalf of EnviroWaste Ltd:



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**Laurence Dolan**  
**Environmental Manager**  
MSc(Hons) Dip Nat Res

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**Kaaren Rosser**  
**Environmental Planner**  
BSc, DipNatRes, CPlan, Assoc. NZPI

Section of Proposed Plan	Support/ Oppose	Specific Text Identified	Relief Sought	Reasons
LLRZ- Large Lot Residential Zone				
LLRZ- P5 Adverse Effects	Support with amendments	<i>1. built form is of a scale and design that is compatible with the character, amenity values and purpose of the zone;</i>	Addition of text as follows: 1. built form is of a scale and design that is compatible with the character, amenity values and purpose of the zone <u>and maintains the amenity values anticipated in adjacent zones;</u>	The addition of the proposed text will help ensure that any lawfully established activities in an adjacent zone will not be unduly compromised by activities in the residential zone, resulting in reverse sensitivity effects on existing established uses.
LLRZ – S4 Setbacks	Support with amendments	<i>2. All residential units and buildings not otherwise specified shall be setback a minimum of 10m from internal boundaries.</i>	Addition of <i>'internal boundaries- <u>except that where an allotment is adjacent to the Industrial Zone, any residential unit or habitable buildings within that allotment shall be setback a minimum of 20m from the boundary adjacent to the Industrial Zone</u>'.</i>	The existing rules for Residential 3, now proposed to be Large Lot Residential, require that a 20m setback is provided adjacent to an Industrial Zone. This rule should be retained so that dwellings do not impact the industrial activities adjacent. Continuing an appropriate buffer will allow the maintenance of necessary industrial activities such the Twizel Transfer Station located adjacent to Large Lot Residential sites on Temple Drive.
MRZ- Medium Density Residential Zone				
MRZ-R1 Residential Units	Support with amendments	<i>Activity status when compliance is not achieved with R1.1 or R1.2: RDIS Where: the activity complies with....</i>	<i>Activity status when compliance is not achieved with R1.1 or R1.2: RDIS Where: the activity complies with.... <u>MRZ-S11 Waste Management</u></i>	In order to introduce a new Waste Management standard (see below), not complying with the standard needs to be added to the list of standards for restricted discretionary standards where the 400m <sup>2</sup> density is exceeded. The standard only then applies when the density rule is triggered.
MZ-R9 Retirement Villages	Support with amendments	<i>c. Provision of landscaping, open space, and on-site amenity for residents.</i>	<i>c. Provision of landscaping, open space, <u>waste storage</u> and on-site amenity for residents.</i>	Waste management for retirement villages needs to be carefully planned and considered at design stage not when waste is being generated during operation. The additional text will allow waste management to be considered at consent.
MRZ- S11 Waste Management	Support	New standard for waste management	1. <i><u>Where individual bins are used, a minimum storage space for bins of 1.4m<sup>2</sup> per dwelling is provided (note: communal bins – refer to Solid Waste Bylaw). The bins must be visually screened, be accessible for residents to get to the kerb without stairs or steep gradients.</u></i> 2. <i><u>Where kerbside collection is employed, a kerbside space of 1m per dwelling is available without impeding the footpath.</u></i>	Given the proposed density of 1 unit per 200m <sup>2</sup> , the space allocated for waste management is often not thought about or not designed for given the tight building envelopes required for this density. Bin storage that is not designed for can generate adverse effects on amenity and the health and safety of residents, road corridor users and collection staff. The proposed standard allows for bin storage to be of a sufficient size, and in a location that will be screened from the road or access to the site. The standard requires bins to be accessible so that when moving from their storage location to the kerbside, the access is without steep gradients or stairs and is wide enough for bin access. The standard will ensure that bins do not obstruct driveways or be located on the footpath.  If developments do not use individual bins or have off-site collection, the Solid Waste Bylaw requires a Waste management and Minimisation Plan to be implemented for multi-unit developments.

			<u>Activity Status were compliance not achieved: RDIS</u> <u>Matters of discretion are restricted to: RES – MD9 Waste Management</u>	
<b>RESZ- Matters of Discretion</b>				
RESZ-MD3 Setbacks	Support with amendments	<i>c. For internal boundaries, the extent of adverse effects on privacy, outlook, shading, and other amenity values for the adjoining property.</i>	Addition of new sentence: <u>...property. Any specific setback to an Industrial Zone is intended to protect the amenity of those zones and minimise reverse sensitivity issues arising from permitted activities within the Industrial Zone.'</u>	This additional text is necessary to provide an additional matter of discretion for the 20m setback proposed to be retained under LLRZ – S4 above. The Twizel transfer station is a regional land use that is difficult to establish in alternative locations. Therefore, they must be protected from reverse sensitivity to ensure its ongoing operation.
RESZ- MD9 Waste Management	Support	New matter of discretion	<u>RESZ- MD9 Waste Management</u> a. <u>Waste management capacity, visual appearance and accessibility.</u> b. <u>Adverse effects on the streetscape.</u>	The proposed waste management standard requires appropriate matters of discretion to enable consideration of non-compliances to the standard.
<b>GIZ-General Industrial Zone</b>				
GIZ-O1 Zone Purpose		<i>The General Industrial Zone provides primarily for industrial activities and other compatible activities, as well as activities that support the functioning of industrial areas</i>	<i>The General Industrial Zone provides primarily for industrial activities and other compatible activities <u>that do not compromise the functionality of the zone for industrial activities, as well as activities that support the functioning of industrial areas.</u></i>	EnviroWaste supports the objective but is concerned that compatible activities can be judged in many different ways, and which may not be appropriate to some industrial activities. The proposed additional text will ensure that industrial activities have primacy in the zone.
GIZ-P1 Industrial Activities	Oppose	<i>Enable a range of industrial activities and activities of a similar scale and nature to industrial activities, to establish and operate within the General Industrial Zone.</i>	<i>Enable a range of industrial activities and activities <del>of a similar scale and nature to industrial activities complying with GIZ- R3 and R4,</del> to establish and operate within the General Industrial Zone.</i>	The submitter is concerned that enabling activities that are 'of a similar nature and scale to industrial activities' is too vague and may lead to reverse sensitivity effects on existing and new industrial activities. It may also change the fabric of the industrial zones in the District so that the purpose of the zone is compromised over time. By narrowing the policy to only enable those activities permitted under the rules will confine the range of uses enabled. To deal with non-industrial discretionary activities, GIZ-P2 then applies.
GIZ-P2 Other Activities	Support			The submitter supports this policy as written provided the amendment to P1 is accepted.
GIZ-R4 Ancillary Activities	Support with amendments	<i>Activity Status: PER</i> <i>Where:</i> <i>1. The activity is ancillary to a permitted activity; and</i> <i>2. Except on rear sites, any</i>	<i>2. <u>Except on rear sites, any office or showroom shall be sited at the front of buildings.</u></i> <i>3. <u>The office gross floor area does not exceed 30 per cent of all buildings on the site; or the</u></i>	The proposed additional text puts a size limit on the most common types of activities that are likely to give rise to reverse sensitivity effects which could inhibit or discourage industry from operating in close proximity. Without such a limit and assessment through a resource consent, ancillary activities may become more than subservient to the main activity on the site.

		<i>office or showroom shall be sited at the front of buildings.</i>	<u><i>office gross floor area does not exceed 100m<sup>2</sup>.</i></u> <u><i>4. The showroom gross floor area does not exceed 10 per cent of all buildings on the site.</i></u>	
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