

Notified Resource Consent Submission Form

Form 13

Section 41D, 95A, 95B, 96, and 127(3), of the Resource Management Act
1991

Send to: Waipā District Council, Private Bag 2402, Te Awamutu 3840
Phone: 0800 924 723 | **Fax:** 07 872 0033 | **Web:** www.waipadc.govt.nz |
Email: submissions@waipadc.govt.nz

COUNCIL USE ONLY

Date received

Application ref:

1 Submitter details

Full name of submitter:	Aotearoa Park Developments Limited
Contact name if different from above:	Agent - Esther Neill and Aotearoa Park Developments Ltd - Libby Cochrane
Contact phone number:	
Email address:	
Postal address: (required if no email address is provided)	

We will serve all formal documents electronically via the email address provided above. Where there is no email address provided the documents will be posted to the above address.

Personal information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991. The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. Your submission, including your name and contact details, will be made available to the decision-maker and other parties involved in the application. It may also be made available on the Council's website. If requested, the Council is legally required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you believe there are compelling reasons why your contact details should be kept confidential, please contact the Processing Planner for this application.

Please attach additional sheets if there is not enough space for your submissions. If you do not wish to use this form, please ensure that the same information required by this form is covered in your submission.

2 This is a submission on an application from (name, address & activity) –

ResourceCo Limited - Managed Fill Activity at 3831 Cambridge Road

3 Trade competition

Select one	☐	I am	a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
	☒	I am not	
Select one	☒	I am	directly affected by an effect of the subject matter that – (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition
	☐	I am not	

4 Attendance at Council hearing

Select one	☒	I do	wish to be heard (attend and speak at the Council hearing) in support of my submission
	☐	I do not	

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

☒ Yes
☐ No

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

See attached.

6 My submission is either in part or all: ☒ In support ☐ Opposed ☐ Neutral

The reasons for my submission are:

See attached.

7 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)

See attached relief sought.

8 Hearings Commissioners

Select one	☒	I request	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.
	☐	I do not request	

9 Signature of submitter *(note: a signature is not required if you make your submission by electronic means, however please type your name below)*

Name and Signature of submitter:
(or person authorised to sign on behalf of submitter)

Esther Neill

Dated 24.06.2026

Notes to submitter

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 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.



Email: [REDACTED]

25 June 2026

Our ref: 3718

Waipā District Council

Attention: Layla Gruebner

Via email: submissions@waipadc.govt.nz

CC - Saddleback Planning Ltd

Attention: Joe Gray
[REDACTED]

SUBMISSION OF AOTEAROA PARK DEVELOPMENTS LIMITED ON LU/0231/25 – LAND USE CONSENT TO ESTABLISH AND OPERATE A MANAGED FILL ACTIVITY

Introduction

1. This submission is made on behalf of Aotearoa Park Developments Limited (APDL), the owners of 4, 5, 8, 11, 13 and 15 Bruce Cochrane Lane, which form part of Aotearoa Park.
2. Aotearoa Park is an industrial park, comprising 16 hectares of land to the east/northeast of the application site. Aotearoa Park is zoned Industrial which means a variety of processing and manufacturing activities are anticipated to be established here, including food processing and storage activities.
3. Aotearoa Park has a long history with food processing activities, formally occupied by a meat processing facility, before being purchased by the current owners in the early 1990s. Current tenants of Aotearoa Park include Inghams Enterprises (NZ) Pty Ltd who undertake food processing activities at the site.
4. APDL acknowledges ResourceCo has existing, consented activities occurring at 3831 Cambridge Road. However, the assessment undertaken in respect of the managed fill activity has not appropriately considered potential effects on Aotearoa Park. In particular, the assessment appears to rely heavily on the Industrial Zoning and has not appropriately considered the sensitivity of activities that can, and do, occur at Aotearoa Park.

5. APDL considers there is insufficient evidence to conclude that adverse effects on Aotearoa Park are minor or more than minor.

Effects of Proposal

Dust/Air Quality

6. The Air Quality Assessment, prepared by Pattle Delamore Partners Ltd (PDP) on behalf of the Applicant, has not acknowledged that food processing and storage activities are, and can, occur within Aotearoa Park. This assessment has not identified APDL/Aotearoa Park as a sensitive receptor and therefore has not appropriately assessed potential dust effects on APDL.
7. Food processing activities have strict regulations to adhere to in respect of the Ministry for Primary Industries (MPI). Therefore, any dust effects on APDL could have much greater consequences compared to surrounding rural-residential properties.
8. The Air Quality Assessment has only identified sensitive receptors to the west / southwest of the application site, being rural-residential properties. This has informed the entire assessment prepared by PDP, including the proposed mitigation measures and locations of the proposed real-time dust monitors. The assessment and proposed mitigation measures are not fit for purpose when assessing potential dust effects on APDL.
9. PDP utilised weather data from Newcombe Road weather station which is located 5km to the east of the site and concluded that predominant winds blow from the east and southeast. It is well known within this locality that there is a prevailing westerly wind. PDP has not assessed any receptor to the east of the application site.
10. The proposal has not considered any cumulative dust effects on APDL in respect to the existing Revital Composting Facility, which is located less than 50m from APDL's site.
11. The Applicant is proposing to remove the existing stand of mature pine trees within the northeastern corner of Resource Co's site. Effects of this in respect to dust mitigation have not been considered.
12. The Application documents note that Council have received existing complaints relating to dust generated from the site. The Application also notes that the meteorological data received by Revital Group Limited was unsuitable for use in a comprehensive air quality assessment. This suggests that the existing mitigation and monitoring occurring within this receiving environment is not adequate.

13. APDL acknowledges that management measures can assist in reducing dust, however any proposed controls need to be realistic and reliable to ensure dust effects on highly sensitive receptors remain less than minor.

Groundwater and Stormwater

14. Groundwater appears to be a known issue within the site. Management measures include the construction of a deep and shallow ground water treatment pond located adjacent to the south-west of APDLs site. Both the Applicant's AEE and Waipā District Council's notification report have not specifically assessed groundwater effects on APDLs site.
15. APDL acknowledges that Waipā District Council has assessed effects relating to stormwater and found no properties to be adversely affected. However, both the Applicant's AEE and Waipā District Council's notification report have not specifically considered groundwater and stormwater effects on Aotearoa Park.
16. Waipā District Council has not undertaken a technical peer review of the Technical Assessment of Environmental Effects prepared on behalf of the Applicant by Babbage Consultants. Although surface runoff from the site and discharges to the stream appear to be small compared to the total stream flow, APDL note that Babbage Consultants have stated the runoff coefficient has been taken from the Queensland soil conservation guidelines. APDL therefore question the overall technical robustness of this assessment within the New Zealand context.

Earthworks and Retaining Wall

17. A mechanically stabilised earth (MSE) retaining wall is proposed to be constructed along the northern boundary of the applicant's site. This does not immediately adjoin APDLs site; however, instability within the site has been identified as a known risk and the Preliminary Geotechnical Assessment prepared by HDGeo states that further ground investigation and detailed wall design are needed. Stability of the banks of the unnamed stream is an existing concern for APDL.
18. APDL acknowledges that detailed design would occur prior to construction of the MSE, and that a detailed Earthworks Management Plan is likely to form a condition of consent. However, no specific assessment has been undertaken in relation to effects associated with constructing the MSE on adjacent properties.

19. As noted above, APDL has existing concerns for the stability of the stream which separates the Applicant's site from Aotearoa Park. Cumulative effects of the proposal on the stability of the stream banks, and subsequently on the stability of APDL's land have not been considered.

Council Process and Integrated Assessment

20. APDL is concerned that the assessment process between Waipā District Council and Waikato Regional Council has not occurred in a concurrent manner. This resulted in separate notification assessments, which originally resulted in differing conclusions in respect of APDL.
21. Given the nature of the proposal and the overlap between earthworks, stormwater, groundwater, dust/air quality and cumulative effects, APDL considers that an integrated assessment is necessary to ensure all actual and potential effects on Aotearoa Park are properly understood before any final decision is made.
22. If Waipā District Council and Waikato Regional Council continue to assess the proposal separately, APDL is concerned that cumulative and cross-boundary effects on Aotearoa Park may not be fully identified or addressed.

Summary and Relief Sought

23. APDL acknowledges that a managed fill activity may, in principle, form part of the rehabilitation of an existing quarry site. However, APDL considers that the information currently provided does not adequately assess the potential adverse effects of the proposal on Aotearoa Park, including existing and anticipated industrial activities, food processing and storage activities. Cumulative effects of the proposal in conjunction with existing nearby activities have also not been adequately assessed.
24. In particular, the assessment has not adequately addressed potential dust effects, groundwater and stormwater effects, construction and earthworks effects, stream bank stability, or cumulative effects on APDL's land and activities. APDL therefore considers that further assessment and technical review is required before Waipā District Council can be satisfied that adverse effects on APDL will be appropriately avoided, remedied or mitigated.

25. APDL considers that the proposal's effects are interrelated and concurrent assessment by Waipā District Council and Waikato Regional Council is necessary before either authority reaches a final position on effects, mitigation and conditions.

APDL requests that:

26. Waipā District Council and Waikato Regional Council coordinate their respective resource consent processes, including through concurrent or integrated assessment where practicable, before either authority reaches a final position on effects, mitigation or conditions.
27. The Air Quality Assessment prepared by PDP is updated to undertake a full assessment of potential effects on Aotearoa Park, including the existing food processing and storage activities and other industrial activities that are anticipated within the Industrial Zone. This assessment should utilise site-specific meteorological data from the Applicant's weather station, installed in June 2025.
28. Waipā District Council undertakes a full technical review of the updated Air Quality Assessment and any proposed mitigation, management and monitoring measures. This review should specifically address cumulative dust effects, including effects associated with the existing Revital Composting Facility and the proposed removal of existing pine trees.
29. Waipā District Council and Waikato Regional Council carefully consider whether the proposed mitigation, management and monitoring measures are sufficiently certain, enforceable and effective to ensure that dust effects on Aotearoa Park, including food processing and storage activities, are appropriately avoided, remedied or mitigated. This should consider any existing mitigation and monitoring that may have been required in relation to the existing consented activities and whether this has been appropriate.
30. The reference to Queensland soil conservation guidelines within the Technical Assessment of Effects is reviewed, and Waipā District Council and Waikato Regional Council require confirmation that the stormwater and runoff assessment is technically appropriate in the New Zealand site-specific context.
31. Further specific assessment is undertaken of potential stormwater, groundwater, earthworks and construction effects on Aotearoa Park, including cumulative effects on the stability of the unnamed stream and APDL's land.

32. Consent is not granted, or alternatively no final conditions are confirmed, until the above assessments and technical reviews have been completed and APDL has had a reasonable opportunity to review and comment on any updated material and proposed draft conditions.

33. APDL is willing to engage with the Applicant in advance of any hearing to discuss the above concerns and review any proposed conditions.

Kind regards

A handwritten signature in black ink, appearing to be 'E. Neill', with a long, thin horizontal line extending to the right.

Esther Neill
Senior Planner
Nicholson Surveying Ltd