# Attachment 4

## FTAA Section 22 Information

# Fast-track Approvals Act Section 22 Requirements

## 1. Executive Summary

The Whiterock Quarry and Managed Fill proposal (the Project) is a regionally significant infrastructure project that addresses a recognised shortfall in compliant and dedicated Class 3 managed fill and contaminated soil disposal capacity in Canterbury. The Project will establish a purpose-built facility within an existing quarry, providing the adaptive re-use of an already disturbed site as a fit-for-purpose disposal option that improves the efficiency and resilience of the regional waste management system. The Project provides waste-management infrastructure needed to support urban development across Canterbury, including housing, redevelopment, infrastructure and associated construction activity, in response to well-established and growing regional demand.

Importantly, the issue is a shortage of appropriately located, appropriately classified, and cost-effective Class 3 disposal capacity in the region. While Canterbury has existing landfill capacity, much of that capacity is provided by higher-class facilities designed for different waste streams and located further from the principal areas of waste generation. Reliance on those facilities creates avoidable inefficiencies, higher disposal costs, increased transport requirements, and additional pressure on finite Class 1 and Class 2 landfill capacity.

At present Canterbury is heavily reliant on a small number of disposal facilities. Existing disposal options are constrained by location, cost, and operational limitations, resulting in inefficiencies, delays, and increased compliance risks. By providing additional, appropriately located capacity, the Project improves alignment between waste streams and disposal infrastructure and reduces reliance on higher-specification (Class 1 and 2) landfills which have associated disproportionate costs and constraints for Class 3 waste type. It also adds system resilience should capacity, operational, transport or consent constraints arise elsewhere.

Section 22 distinguishes the Project's overall regional benefits from economic benefits, which are only one matter the Minister may consider. Throughout this attachment, "regional benefits" refers to the combined infrastructure, urban-development, environmental, system-resilience and economic benefits of the Project. "Economic benefits" refers only to the economic component of that wider case. The assessment therefore considers the benefits as a package, including direct and quantifiable benefits and indirect, enabling and system-level benefits.

The reason the Project is considered to be an infrastructure project that will deliver significant regional benefits is the combined effect of the following matters:

- **Provision of regionally significant infrastructure**
    - Adds new Class 3 managed fill capacity within Canterbury
    - Preserves finite Class 1 and Class 2 landfill capacity (e.g. Kate Valley and Woodstock) for higher-risk waste, deferring the need for and cost of providing additional higher-class capacity
    - Improves the efficiency and resilience of the regional disposal network
- **System-level economic efficiency gains**
    - Reduces haulage distances, transport costs, and associated emissions
    - Lowers disposal costs by directing waste to fit-for-purpose facilities
    - Addresses current inefficiencies in the disposal network by improving the allocation of waste streams to disposal facilities designed for those materials rather than increasing waste volumes

- **Enabling development and infrastructure delivery**
    - Reduces a key constraint on urban development, including housing and infrastructure projects
    - Improves feasibility of development, particularly for contaminated and brownfield sites
- **Environmental and system performance outcomes**
    - Improves alignment of waste streams with appropriate facilities ("right waste, right place")
    - Reduces transport-related emissions and inefficient disposal practices
    - Supports landfill remediation, waste minimisation, and reduction in illegal dumping

Referral under the Fast-track Approvals Act 2024 (FTAA) is appropriate, as it would provide a more timely and efficient consenting process, with greater procedural and timing certainty, for a project that is regionally significant, well advanced, and supported by a substantial and detailed technical evidence base.

# 2. Introduction

This attachment sets out how the proposed Whiterock Quarry and Managed Fill project (the Project) satisfies the criteria for referral under the Fast-track Approvals Act 2024 (FTAA), and why referral through the FTAA process is appropriate.

The Project involves the establishment and operation of a Class 3 Managed Fill facility within the existing Whiterock limestone quarry at Loburn, alongside the continued operation of the quarry. The facility is intended to receive sorted inert construction and demolition (C&D) materials, contaminated soils, and asbestos-containing materials, providing an additional disposal option within the Canterbury region.

The purpose of this attachment is to demonstrate that the Project is an infrastructure development that would deliver significant regional benefits, having regard to the matters set out in section 22 of the FTAA. In doing so, this attachment draws on a suite of supporting material, including:

- Attachment 5: WSP 2026. Whiterock Quarry & Managed Fill – Analysis of the Significant Benefits to the Region, 8 June 2026, Rev B. Analysis of the strategic need for additional Class 3 disposal capacity and the role of the project within the Canterbury waste management system.
- Attachment 6a: Sapere April 2026, An independent economic assessment of the project's effects, including both regional economic activity and system-level efficiency outcomes.
- Attachment 6b: Sapere July 2026, Whiterock Class 3 Managed Fill development – a response to a statement of evidence from Dr Richard Brent Meade, Cognitus Economic Insight.

Collectively, this material establishes that the Project responds to an identified constraint within the regional waste disposal network. It addresses limitations in the availability, location, and cost of appropriately consented facilities for the disposal of inert and low-risk contaminated materials. By providing additional, well-located Class 3 capacity, the Project would improve the efficiency and resilience of the waste management system, support ongoing development activity, and contribute to broader economic and environmental outcomes across Canterbury.

This attachment is structured to follow the relevant criteria in section 22 of the FTAA. It provides a summary of how the proposal meets each of those criteria, with detailed supporting information contained in the accompanying reports.

# 3. Section 22(1)(a) Significant Regional or National Benefits

This section considers the criteria under section 22(1)(a) for accepting a referral application:

> *(1) The criteria for accepting a referral application are that—*
>
> *(a) the project is an infrastructure or development project that would have significant regional or national benefits; and*

*(b) referring the project to the fast-track approvals process—*

*(i) would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and*

*(ii) is unlikely to materially affect the efficient operation of the fast-track approvals process.*

For the purposes of subsection (1)(a), the Minister may consider the matters set out in sections 22(2)(a)(i) to (x) and any other matters the Minister considers as relevant.

The Project will deliver significant regional benefits through three primary pathways:

- Provision of regionally significant infrastructure through the addition of Class 3 managed fill capacity within Canterbury's disposal network.
- Improved system efficiency, arising from better alignment between the location of waste generation and disposal infrastructure – "right waste in the right place".
- Enabling effects, supporting the delivery of housing, infrastructure, and development activity by reducing a key constraint in the development process.

These benefits are supported by independent economic analysis and broader technical evidence and are consistent with national and regional policy direction for waste management and infrastructure provision.

The following sections address the matters listed in section 22(2)(a). Those matters are relevant considerations that the Minister may take into account when assessing whether the Project meets section 22(1)(a). They are not separate mandatory thresholds. The absence of one matter does not determine the referral application. The assessment turns on the overall package of regional benefits.

***Section 22(2)(a)(i) Whether the project has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list***

The Project is not identified as a named priority project in a central government infrastructure priority list or specific spatial plan. However, it is strongly aligned with national and regional waste management policy settings, including:

- Waste Minimisation Act 2008
- Waste and Resource Efficiency Strategy 2025
- Regional and territorial authority waste management and minimisation plans.

At a national level, the Waste Minimisation Act and the Waste and Resource Efficiency Strategy set a clear direction toward improving resource efficiency, reducing waste, and ensuring that materials are directed to facilities with an appropriate level of containment. These frameworks emphasise the importance of diverting inert construction and demolition materials and contaminated soils away from higher-specification Class 1 landfills and into facilities designed for those waste streams.

The Project supports these outcomes by providing dedicated Class 3 infrastructure that enables "the right waste to go to the right place", consistent with national strategy. In doing so, it improves the alignment between waste streams and disposal infrastructure, reduces reliance on higher-specification facilities for lower-risk materials, and supports the efficient functioning of the regional disposal network.

This direction is reinforced through the staged expansion of the waste disposal levy across landfill classes, which creates a policy and economic framework that supports the development of lower-class, fit-for-purpose facilities to manage inert and low-risk contaminated materials. The levy and specific controls required for the various classes of landfill support the economic justification for having landfills of different class. Optimum efficiency will be achieved when all waste is directed to the correct site, rather than imposing cost by use of a higher classification site.

The WasteMINZ Guidelines are the current endorsed guidance for the disposal to land sector, establishing best practice approaches for the management of solid waste (disposal facilities). The current landfill classification system, Classes 1 to 5, were established to reflect the difference in controls associated with each type of waste stream and to provide clear guidance on waste acceptance and engineered containment design. A summary of the class definition and the anticipated characteristics of the waste and the main anticipated contamination risks is provided in Table 1.

*Table 1. Landfill Class Rationale - Simplification of Table 2-2 in the WasteMINZ Disposal to Land Guidelines 2023*

| Class 1 | Class 2 | Class 3 | Class 4 | Class 5 |
|---|---|---|---|---|
| Municipal Solid Waste Landfill | Construction and Demolition (C&D) Landfill | Managed Landfill | Controlled fill | Cleanfill |
| Household Refuse, Industrial Commercial Waste | Biodegradable waste including Timber and Textiles | Inert Materials, including Contaminated Soil, sorted C&D waste | Low level contaminated soils and hardfill (e.g. concrete rubble) | Virgin Excavated Natural Materials, clean soil suitable for re-use |
| Landfill Leachate and Landfill Gas (LFG) | Potential Leachate and LFG | Low production of Leachate, no LFG | No leachate or LFG | No leachate or LFG |

Across New Zealand there is an increasing demand for Class 2 to 4 disposal sites, as the higher operational costs (landfill gas capture, operational controls etc.) and levy settings applying to Class 1 municipal landfills continue to increase disposal costs. Canterbury reflects this national trend, with similar cost pressures contributing to growing reliance on, and demand for, lower-class disposal options. At a regional level, waste management and minimisation plans across Canterbury recognise the need for a range of disposal options that reflect different waste types and levels of risk, and that support improved resource recovery and system efficiency. While the Project is not specifically identified in these plans, it directly implements their intent by providing additional managed fill capacity that addresses existing constraints in availability, location, and cost of disposal options.

Within this policy context, the Project gives effect to these strategic directions by providing additional Class 3 managed fill capacity in a location that is well positioned relative to the primary sources of waste generation in Greater Christchurch and surrounding districts. The Project supports the delivery of these policy objectives by improving the alignment between waste streams and disposal infrastructure, enhancing system efficiency, and contributing to the long-term performance and resilience of the regional waste management network.

Accordingly, the Project is considered consistent with, and gives practical effect to, established national and regional policy direction. While not identified as a specific priority project, it is aligned with the strategic outcomes those frameworks are intended to achieve.

**Section 22(2)(a)(ii) Whether the project will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure**

The Project will deliver new regionally significant waste management infrastructure by adding Class 3 managed fill capacity to Canterbury's waste disposal system – refer to supporting Significant Benefits report (Attachment 5). This directly addresses identified constraints in existing disposal options, including limited capacity, restrictive acceptance criteria, and operational limitations.

Although waste disposal infrastructure is not included in the Canterbury Regional Policy Statement (CRPS) definition of regionally significant infrastructure,[1] that definition is not determinative of the question under

[1] **Regionally significant infrastructure is**: 1. Strategic land transport network and arterial roads 2. Timaru Airport 3. Port of Timaru 4. Commercial maritime facilities at Kaikōura 5. Telecommunication facilities 6. National, regional and local renewable electricity generation activities of any scale. The electricity transmission network 8. Sewage collection, treatment and disposal networks 9. Community land drainage infrastructure 10. Community potable water systems 11. Established community-scale irrigation and

section 22(2)(a)(ii). Waste management infrastructure performs an essential enabling function by supporting urban development, infrastructure delivery, and environmental management outcomes. In that context, the provision of fit-for-purpose disposal infrastructure is appropriately characterised as regionally significant.

The Canterbury Land and Water Regional Plan (LWRP) objectives include Objective 3.3:

> *Nationally and regionally significant infrastructure is enabled and is resilient and positively contributes to economic, cultural and social wellbeing through its efficient and effective operation, on-going maintenance, repair, development and upgrading.*

Nationally and regionally significant infrastructure is defined in the LWRP as "*includes, but is not limited to, infrastructure for activities recognised by a National Policy Statement as being nationally significant*."

Under the National Policy Statement for Infrastructure 2025 (NPSI), "infrastructure" includes "additional infrastructure", which expressly includes resource recovery and waste disposal facilities. The proposed managed fill is therefore infrastructure for the purposes of the NPSI. The definition of "infrastructure activities" also includes all ancillary infrastructure activities, including earthworks and land disturbance and the construction or upgrading of access tracks, bridges and culverts. The works required to establish and operate the managed fill therefore form part of the infrastructure activity. The quarrying component of the Project is an "infrastructure supporting activity". The Project's location within, and development alongside, an existing quarry enables the efficient dual use and progressive rehabilitation of an already disturbed site.

The following definitions are provided in the NPSI. **Waste disposal facilities**, that is, landfills and managed fills, are considered as **additional infrastructure** and therefore are infrastructure under the NPSI.

> ***infrastructure*** *includes all infrastructure as defined by the Act and* ***additional infrastructure*** *as defined in this National Policy Statement*
>
> ***additional infrastructure*** *includes:*
>
> *(a) a relevant school or institution as defined in the Education and Training Act 2020;*
>
> *(b) a health facility operated by Health New Zealand to meet its obligations under the Pae Ora (Healthy Futures) Act 2022;*
>
> *(c) fire and emergency services facilities;*
>
> *(d) defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990;*
>
> *(e) correction facilities operated by the Department of Corrections to meet its obligations under the Corrections Act 2004;*
>
> *(f) a stormwater network;*
>
> *(g) resource recovery or* ***waste disposal facilities****; and*
>
> *(h) flood control and protection works carried out by, or on behalf, of a local authority.*
>
> ***ancillary infrastructure activities*** *mean an activity that supports and is subsidiary to an infrastructure activity, including but not limited to:*
>
> *(a) vegetation clearance and tree trimming;*
>
> *(b) earthworks and land disturbance;*
>
> *(c) construction, maintenance, repair and upgrading of access tracks, bridges and culverts; and*
>
> *(d) power supply and telecommunications*

stockwater infrastructure 12. Transport hubs 13. Bulk fuel supply infrastructure including terminals, wharf lines and pipelines. 14. Electricity distribution network 15. Infrastructure defined as 'strategic infrastructure' in this regional policy statement. Note: For the avoidance of doubt, this infrastructure is also referred to as 'infrastructure that is regionally significant'.

The Project will:

- Provide additional, appropriately located Class 3 disposal capacity within the region
- Reduce reliance on higher-order Class 1 and Class 2 landfills for waste streams more appropriately managed at lower-specification facilities
- Preserve finite Class 1 landfill airspace for materials requiring higher levels of containment thereby extending the operational life of key regional infrastructure
- Improve the overall efficiency, resilience, and functionality of the regional waste disposal system.

Collectively, these outcomes support both the delivery of new infrastructure and the continued functioning of existing regionally significant infrastructure.

In particular, the Project plays an important enabling role in supporting regionally and nationally significant infrastructure and development activity. This includes:

- Supporting residential development and housing delivery across Greater Christchurch and surrounding districts by enabling the efficient and compliant disposal of contaminated soils and construction materials, which are a necessary input to both greenfield development and urban redevelopment, particularly on brownfield sites.
- Enabling the continued functioning of existing 'regionally significant infrastructure' such as Council's wastewater, water supply, and stormwater networks ('3 waters') and roading renewals and upgrades for urban areas in Greater Christchurch and Canterbury. Waste disposal is an important cost component of renewals and upgrades to networks. In Christchurch for example approximately 50% of the roading pavement is impacted from historic coal tar application as a binder. Having an alternative Class 3 facility with lower disposal costs for coal tar than other existing facilities in the region will provide more cost-effective options for maintenance and upgrades to existing Council infrastructure.
- Enabling the continued functioning of strategic infrastructure being the Kate Valley Regional Landfill and Class 2 facilities such as Woodstock by reducing overall volumes and the inert waste currently going, or in the future going to, higher class facilities. The diversion of inert waste from a Class 1 landfill is important because fill sites are a finite resource. Preserving the airspace in Class 1 and 2 facilities is an important, strategic objective to ensure these critical pieces of infrastructure last for as long as possible and so society does not pay more than it needs to, in disposing of waste.

By enabling waste streams to be directed to facilities designed for those materials, the Project ensures that infrastructure within the disposal hierarchy is used in accordance with its intended role. This improves overall system efficiency, reduces misallocation of waste to higher-specification facilities, and supports the long-term sustainability of the regional waste management network.

In this way, the Project not only delivers new regionally significant infrastructure, but also enhances the performance and longevity of existing infrastructure. It does so by reducing pressure on constrained facilities, improving system efficiency, and supporting the continued operation of critical regional infrastructure over the long term.

Accordingly, the Project is properly characterised as both delivering new regionally significant infrastructure and enabling the continued functioning, efficiency, and durability of existing infrastructure within the regional waste management system.

**Section 22(2)(a)(iii) Whether the project will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)**

The Project supports urban development, including housing supply and a well-functioning urban environment by addressing a key constraint in the development process, namely the availability of suitably located and appropriately consented disposal capacity for contaminated soils and C&D materials.

The Project will:

- Enable the efficient and compliant disposal of contaminated soils and construction and demolition materials generated through both greenfield and brownfield development.
- Reduce delays to development programmes associated with constrained access to disposal facilities and operational limitations within the existing network.
- Reduce cost escalation arising from the need to transport material to more distant or higher-cost facilities.
- Improve the feasibility of development, particularly for sites where contamination is present and disposal costs are a material component of project economics.

The availability of additional Class 3 disposal capacity reduces a recognised constraint on development activity, particularly within the growth areas of Christchurch City, Selwyn District, and Waimakariri District. By improving disposal access and efficiency, the Project supports more timely and cost-effective delivery of residential development, urban intensification, brownfield redevelopment and associated infrastructure.

The Whiterock Managed Fill would provide estimated disposal savings of $30-$60 per tonne relative to existing alternative facilities. This savings would support housing supply, redevelopment and intensification by improving project economics – consistent with Policy 1 of the NPS-UD.[2]

Specific analysis of the assistance to urban intensification and where this supports the implementation of the NPS-UD for the Project is provided below:

- Redevelopment Project Viability: Demolition of old housing stock generates significant waste volumes - approximately 30 tonnes per dwelling, of which 57% is rubble, concrete, and other inert C&D waste which would be appropriate at Whiterock. At $30-$60 savings per tonne, this represents ~$500-$1,026 in direct cost reduction per dwelling demolished, improving the economic viability of residential redevelopment projects.[3] [4] [5].
- Brownfield Development Enablement: By reducing disposal costs for contaminated soils (including asbestos), the Whiterock Managed Fill facility would significantly improve the economics of already cleared brownfield sites proposed to be used for residential development.
- Improving Waste Management Infrastructure: Providing specialised disposal facilities for inert C&D materials represents an improvement in regional infrastructure that supports efficient urban development.[6]

While the project does not directly increase housing supply, it enables development activity to proceed more efficiently by reducing the risk that disposal constraints become a limiting factor in project viability or delivery timeframes. In this way, it contributes to the broader objective of a well-functioning urban environment, including the timely supply of development capacity and supporting infrastructure.

Support for this relationship between disposal capacity and development activity is reflected in feedback and letters of support received from industry and sector organisations involved in construction, infrastructure delivery, and land development across Canterbury, including:

- Aggregate & Quarry Association of New Zealand
- Civil Contractors New Zealand (Canterbury Westland Branch)

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[2] https://www.beehive.govt.nz/sites/default/files/2020-07/Final-NPS-UD-July_0.pdf

[3] https://environment.govt.nz/facts-and-science/waste/waste-facilities-and-disposal/

[4] https://knowledgeauckland.org.nz/media/fxwbvcbl/tr2019-009-cba-on-waste-diversion-from-landfill-homes-land-community-auckland.pdf

[5] https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/environmental-plans-strategies/docswastemanagementplan/waste-assessment-2023.pdf

[6] https://environment.govt.nz/assets/Publications/Files/economic-factors-of-waste-minimisation-final.docx

- Construction Contracting Limited
- Corde
- Devcorp Ltd
- Lucas Haining
- Mauger Contracting
- Phil Mauger (in a personal capacity)
- Schick Civil Construction Limited
- Solutions Surfacing

These parties identify the importance of accessible and cost-effective disposal capacity to the delivery of housing and infrastructure, and the role that the proposed facility would play in supporting development outcomes across the region.

Accordingly, the Project will contribute to a well-functioning urban environment by enabling more efficient delivery of development and infrastructure.

**Whether the project will deliver significant economic benefits**

Significant economic benefits are one component of the Project's wider regional benefits. The Sapere assessment and supporting material identify the Project's economic effects, some of which are quantified and others of which cannot presently be quantified with precision. The quantified figures should therefore not be treated as representing the full extent of the Project's economic case.

Together, the quantified effects and the identified economic effects that have not been fully quantified, provide the evidential basis on which the Minister may determine whether the economic benefits are significant. Separately, the Project's enabling role in supporting urban development and its infrastructure, environmental and system-resilience benefits are relied on as regional benefits in their own right, whether or not they can be monetised.

Nothing in section 22 of the FTAA requires a full monetised cost-benefit analysis. Most recently, the Expert Panel on *The Point Project* usefully summarised the principles that may be drawn from earlier FTAA panel decisions concerning the assessment of regional or national benefits. Those principles include that[7]:

- not all benefits are capable of precise financial or monetary calculation;
- a comprehensive cost-benefit analysis is not required; and
- environmental and other non-market effects need not be monetised within the economic assessment.

The approach adopted in the Cognitus Report[8] does not align with those principles, insofar as it both:

- treats the wider statutory assessment of regional or national benefits as necessarily requiring a comprehensive cost-benefit analysis of all market and non-market benefits, costs and adverse effects; and

[7] *The Point Mission Bay Expert Panel: Record of Decision* (12 June 2026) at [324] and [324.1]–[324.13], drawing together principles from the *Maitahi Village, Waihi North, Drury Metropolitan Centre, Rangitoopuni, Ayrburn Film Hub* and *Ashbourne* panel decisions.
[8] Cognits Report forms part of the CRC s11 notice response in Attachment 9. The report is a review of the Sapere report (Attachment 6a).

- treats the result of that economic exercise as the answer to the wider statutory question, rather than as informing the economic component of the overall regional benefits assessment.[9]

Comparisons between projects based on quantified economic benefits should be approached with caution. Quantified economic figures from different fast-track projects are not necessarily directly comparable because the methodologies, scopes and assumptions adopted differ, as does the relationship between those figures and each project's wider regional benefits.

The economic benefits attributable to the Project arise through two distinct but complementary channels. First, the Project generates ongoing regional economic activity associated with its operation. Sapere estimates that the proposal would support approximately 8.7 full-time equivalent (FTE) roles and contribute ongoing economic output to the Canterbury region, with a present value of approximately $17.3 million over a 20-year period.

Secondly, and more importantly from a systems perspective, the Project would deliver economic efficiency gains. These arise from improved alignment between the location of waste generation and disposal infrastructure, resulting in reduced haulage distances, travel times and associated external costs. The analysis identifies efficiency gains associated with reduced transport time, reduced greenhouse gas emissions and reduced safety risks from heavy vehicle movements. These gains represent a reduction in the resources required to deliver disposal services across the region, rather than an increase in overall waste volumes.

The Sapere assessment supports the conclusion that the identified efficiency benefits are additional. Stakeholder evidence indicates that the Project would respond to unmet or poorly served demand and constraints within the existing disposal network. To the extent that material would otherwise be disposed of elsewhere, that alternative provides the counterfactual against which the incremental efficiencies attributable to the Project are measured; it does not negate their additionality.

The magnitude of the quantified efficiency gains depends on the alternative disposal facility and the extent to which the Project can be utilised. Against Taiko Road, Sapere estimates a present value of approximately $35.1 million under the unconstrained scenario and $3.6 million under the consent-constrained scenario; against Kate Valley, the corresponding estimates are approximately $2.9 million and $381,000.

The Significant Benefits Report (Attachment 5) also identifies material private cost savings arising from shorter haulage distances and lower gate fees relative to higher-cost alternatives. Taken together, these produce material regional cost efficiencies by:

- Reducing transport and handling costs for construction, infrastructure and development projects

- Reducing reliance on higher-cost Class 1 and Class 2 facilities for materials more appropriately managed as Class 3 waste.

These outcomes are consistent with the system-level efficiencies identified in the Sapere analysis.

Some Canterbury councils commenting on the Project hold ownership interests in Transwaste Canterbury Ltd, the operator of the Kate Valley Regional Landfill[10]. That does not determine the merits of their views but is relevant context when assessing the weight to be given to statements concerning regional need, existing disposal capacity and the efficiency of the current system. The relevant assessment is not whether the Project may divert material from an existing facility, but whether it would improve the efficiency, resilience and overall functioning of Canterbury's waste-management network. From a regional systems perspective, directing suitable Class 3 material away from higher-class facilities preserves higher-specification landfill capacity for waste requiring that level of containment, defers the need for, and associated cost of, consenting

[9] Statement of Evidence of Dr Richard Brent Meade (27 June 2026) at [12.1], [13.1] and [14]–[21] - contending the FTAA inquiry into significant regional or national benefits necessarily requires a comprehensive CBA of net social welfare, accounting for market and non-market benefits, costs and adverse effects; and at [12.4], [30.9] and [75]–[77.4] - relying on the outcome of that economic assessment to conclude that it is implausible that the Project delivers significant regional or national benefits under the FTAA.

[10] Transwaste Canterbury Limited, *Annual Report for the year ended 30 June 2025*, Directory at 4. The council shareholders are Christchurch City Council (7,780,000 shares), Waimakariri District Council (780,000 shares), Selwyn District Council (600,000 shares), Ashburton District Council (600,000 shares) and Hurunui District Council (240,000 shares).

and providing additional higher-cost Class 1 and Class 2 capacity, increases disposal choice and supports a more resilient regional network.

Sapere quantifies the Project's ongoing contribution to regional economic activity and certain incremental system-efficiency gains. Other economic effects identified in the supporting material - including private transport and disposal cost savings and the economic value associated with deferring the need to provide additional higher-class landfill capacity - have not been fully quantified. Taken together, the quantified effects and the additional economic effects identified but not fully quantified provide a sound basis for concluding the Project will deliver significant economic benefits. Those benefits form one component of, but are not determinative of, the wider assessment of the Project's significant regional benefits.

**Whether the project will support primary industries, including aquaculture**

The Project supports primary industries, particularly agriculture, through its integration with the existing Whiterock lime quarry operation and the associated improvements in freight efficiency.

The managed fill activity would be co-located with an established agricultural lime quarry that already supplies Canterbury's primary industries. The quarry operation has and will continue to supply processed AgLime to primary industry clients, being large scale farmers directly, and lime spreader contractors[11] [12] [13] that operate in the mid and north Canterbury Region. Lime application on pasture benefits grazing by neutralising soil acidity, improving nutrient availability, and enhancing soil structure, ultimately increasing pasture productivity and quality. This leads to healthier plants, improved grazing conditions for livestock, and better overall soil health[14].

In addition, the soft lime rock specific to the Whiterock quarry site is also crushed to create a product called 'Track rock' and is applied by contractors[15] to cow lanes as it reduces hoof soreness and damage compared to other track aggregates.

Approximately 55,000 $m^3$ (bulked) of lime rock over the next 10 years would be excavated in order to develop the managed fill floor and sides. This is conservatively assessed as at least 55,000 tonnes of processed AgLime or crushed lime for supply to the primary industries market.

A key additional benefit of the proposal arises from changes to freight logistics. The Project would enable the return backloading of trucks delivering agricultural lime, allowing those vehicles to transport managed fill material on return trips to more logical stockpile locations, rather than travelling empty. This improves utilisation of existing freight movements and reduces overall transport inefficiencies across the supply chain.

This change in freight dynamics is expected to reduce effective transport costs by approximately 30 percent compared with traditional one-way cartage. As freight represents a significant component of agricultural lime pricing, these efficiencies are expected to flow through to lower input costs for Canterbury farmers and improved affordability of lime application.

The resulting benefits include:

- Lower farm operating costs through reduced input prices for agricultural lime
- Improved freight efficiency and truck utilisation
- Reduced empty truck movements improving overall network efficiency
- Lower emissions intensity per tonne transported
- Improved productivity outcomes across the agricultural sector with more cost-effective soil treatment and pasture management.

[11] https://www.facebook.com/spreadingcanterbury/

[12] https://www.stubbsgroundspreading.co.nz/

[13] https://whitepages.co.nz/w/plaskett-fert-spreading/

[14] https://www.dairynz.co.nz/feed/soil/fertility/#:~:text=Liming%20is%20carried%20out%20to,expense%20of%20low%20fertility%20species.

[15] https://www.mitchelmorecontracting.com/

These benefits arise from more efficient use of existing infrastructure rather than increased production. By improving the economics of lime supply and distribution, the Project would support the continued functioning and efficiency of primary industries within Canterbury.

Accordingly, the Project would support primary industries by enhancing the efficiency, cost-effectiveness, and sustainability of key inputs to agricultural production, and by improving the utilisation of freight infrastructure within the region.

**Whether the project will support development of natural resources, including minerals and petroleum**

The Project will support the development of a mineral resource through the continued extraction and processing of limestone from the existing quarry. As outlined above, approximately 55,000 tonnes of lime rock is expected to be excavated over 10 years to develop the managed-fill floor and sides and supplied as AgLime or track rock.

**Whether the project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions**

The Project would support climate-change mitigation through shorter haulage distances and lower transport-related emissions compared with the counterfactual disposal locations. It is not primarily a climate-mitigation project, and the scale of that benefit depends on utilisation and the alternative disposal facility.

**Whether the project will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards**

There is no direct link between the Project and climate change adaptation or hazard recovery.

However, the Project contributes indirectly to system resilience by providing an additional disposal option and reducing reliance on constrained or more distant disposal options, including facilities potentially vulnerable to capacity or operational limits.

**Whether the project will address significant environmental issues**

The Project will address a number of significant environmental issues within Canterbury's waste disposal network. These issues arise from the current misalignment between waste streams and disposal infrastructure, which has resulted in inefficient use of landfill capacity, unnecessary transport-related emissions and higher disposal costs. Those inefficiencies increase the risk of non-compliant or inappropriate disposal practices.

The Project responds to these issues by improving the alignment between waste type and disposal facility and reducing inefficiencies in how materials are currently managed.

In particular, the Project will:

- Divert inert and low-risk contaminated materials away from higher-specification landfills, ensuring that those facilities are reserved for waste streams requiring greater levels of containment
- Improve alignment between waste type and disposal facility, consistent with best-practice waste management principles
- Address cost and access barriers that may contribute to non-compliant disposal
- Enable more appropriate containment of contaminated soils and asbestos within a purpose-built facility.

These outcomes contribute to improved environmental compliance and overall waste system performance at a regional scale.

The Project would also deliver a range of broader environmental benefits. By improving the proximity of disposal infrastructure to the primary sources of waste generation, it reduces transport distances and associated greenhouse gas emissions. It also supports more efficient use of existing landfill infrastructure, including preserving Class 1 landfill capacity for materials that generate landfill gas and contribute to energy recovery.

In addition, the availability of appropriately consented Class 3 capacity supports the management of waste arising from activities such as development, infrastructure works, and landfill remediation. This reduces the need to transport material long distances or rely on less suitable disposal pathways and supports more effective environmental management of contaminated materials.

The section 11 FTAA notification feedback from Canterbury Regional Council (CRC) notes "*that the provision of compliant cleanfill and managed fill capacity is an issue that has been the subject of ongoing discussion between the quarrying, construction and development sectors, local government and other stakeholders. CRC recognises that the availability and management of suitable disposal capacity is an important consideration for the region*."

Collectively, these outcomes address significant environmental issues associated with the current disposal system, including inefficient use of landfill capacity, transport-related emissions, and risks associated with inappropriate or non-compliant disposal.

**Specific environmental issues addressed**

The Project also addresses three specific environmental issues within the current waste system: closed landfill remediation, waste minimisation, and illegal dumping.

***Closed landfill remediation (and removal) projects***

The availability of appropriately consented Class 3 capacity will support closed landfill remediation (and removal) projects across Canterbury. Such projects are recognised as a significant environmental issue due to the risks associated with legacy landfill sites, including exposure to natural hazards such as flooding, erosion, and coastal processes. Attachment 5 (Significant Benefits Report) identifies that substantial volumes of managed fill material are expected to be generated through these remediation and removal activities.

Existing programmes within Christchurch City Council and Waimakariri District Council include a number of remediation projects that require disposal of degraded and inert waste. For example:

- Christchurch City Council have a series of closed landfill remediation projects in their 10 year long term plan. Three of which at Onuku Bay[16], Okains Bay[17], Allandale[18] have budgets totalling $6.3M and will include waste disposal to a facility authorised to receive the material (which could include Whiterock).

- Waimakariri District Council has included a landfill remediation project in its draft annual plan, with a budget of approximately $350,000.

These projects require the disposal of degraded and inert waste to appropriately authorised facilities. However, the cost and availability of suitable disposal capacity is a key constraint in determining whether remediation (removal) can proceed.

In practice, high disposal costs and limited access to appropriately consented facilities can result in:

- Deferral of remediation in favour of containment

- Increased overall environmental risk from legacy sites

- Sub-optimal environmental outcomes where removal is not economically feasible.

The significant costs of disposal can be a limiting factor for remediation, particularly where such costs were not anticipated as part of the lifecycle management of historical landfill sites. The availability of a suitably located disposal facility capable of accepting degraded and inert waste, including a broad range of contaminants, is therefore likely to influence both remediation feasibility and project scope.

[16] https://budget.ccc.govt.nz/public/Transport%20&%20Waste/Refuse%20&%20Recycling/Onuku%20Bay%20Landfill%20Remediation

[17] https://budget.ccc.govt.nz/public/Transport%20&%20Waste/Refuse%20&%20Recycling/Okains%20Bay%20Closed%20Landfill%20Remediation

[18] https://budget.ccc.govt.nz/public/Transport%20&%20Waste/Refuse%20&%20Recycling/Allandale%20Closed%20Landfill%20Remediation

By providing a suitably located and lower-cost disposal option capable of accepting a broad range of contaminants, the Project would improve the feasibility of remediation and support more effective environmental management of these legacy landfill sites. The proposed facility is well positioned to accept the types of material generated by these projects and is expected to provide a more cost-effective disposal pathway than higher-specification landfill options.

***Waste minimisation***

Attachment 5 (Significant Benefits report) provides details on how the Project contributes to waste minimisation outcomes. At a strategic level the Project would result in a broader range of disposal options for waste in Canterbury, with access to a dedicated Class 3 facility for inert materials and sorted C&D waste.

The availability of appropriately specified disposal infrastructure supports more effective separation of waste streams and encourages investment in sorting and recovery, as suppliers seek to utilise the most efficient and cost-effective disposal pathways. In this way, the Project supports better alignment between waste type and disposal facility, consistent with national waste minimisation objectives.

Over time, increased sorting, recovery, and use of fit-for-purpose disposal facilities is expected to reduce the volume of inert and recoverable materials disposed of to Class 1 landfills. This is a key indicator of waste diversion and improved resource efficiency within the waste management system.

In addition, by improving access to a compliant, appropriately specified, and cost-effective disposal option, the Project would address cost and access barriers for inappropriate or non-compliant disposal practices. This supports more appropriate disposal behaviour and contributes to improved environmental outcomes.

Collectively, these effects contribute to waste minimisation by promoting more efficient use of disposal infrastructure, encouraging resource recovery, and reducing the reliance on higher-specification landfill capacity for materials that can be managed at lower class landfill options.

***Illegal dumping and non-compliant disposal***

Where access to suitable facilities is limited, or where disposal costs are high, there is an increased risk that waste is directed to inappropriate or non-compliant pathways. This represents a significant environmental risk, particularly in relation to contaminated soils and hazardous materials such as asbestos.

Current practice in the development of ‘contaminated’ land sees a large volume of soil being disposed of at municipal landfill sites throughout Aotearoa New Zealand - refer Figure 1 below.

Illegal dumping of waste is a problem in Canterbury. An example is asbestos in soil materials being dumped at a river in the Waimakariri District[19]. Although specific data are not available on the composition of illegally dumped waste in Canterbury, contaminated soils and inert C&D materials are waste streams for which high disposal costs and limited access to appropriate facilities may increase compliance risk.

The Project will contribute to reducing the disposal costs for the managed fil materials proposed to be accepted and hence, by reducing the costs of disposal, could contribute to a reduction in illegal dumping of these materials (as lower disposal costs make appropriate disposal more accessible and affordable).

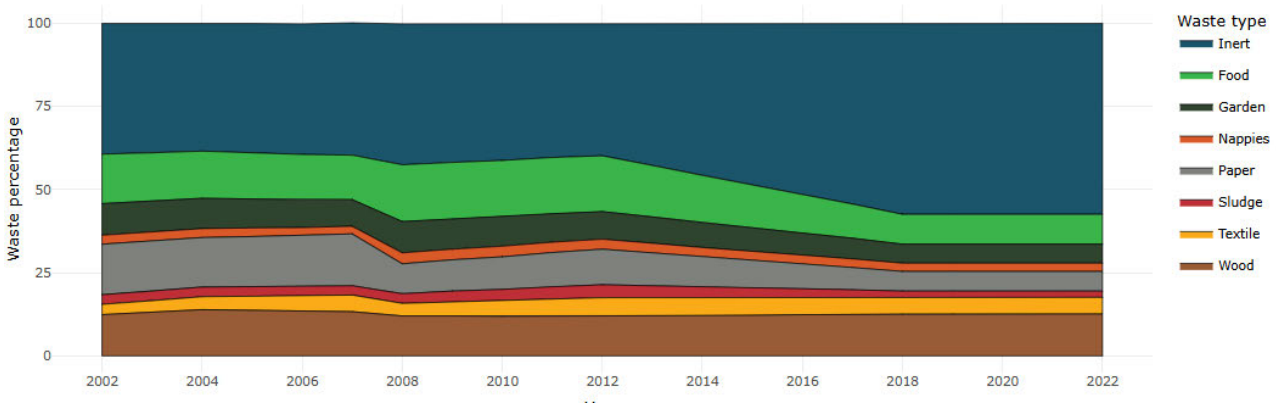



*Figure 1: Waste percentages per waste type in Class 1 landfill* [20]

[19] https://focusanalytics.co.nz/illegally-dumped-asbestos-beside-the-river-leaves-ratepayers-with-costly-clean-up-bill/)

[20] https://environment.govt.nz/facts-and-science/waste/waste-facilities-and-disposal/.

**Whether the project will promote competition in the grocery industry**

There is no direct link between the project and competition in the grocery industry.

**Whether the project is consistent with local or regional planning documents, including spatial strategies**

At a regional and local level, waste management and minimisation plans across Canterbury identify the need for a range of disposal options that reflect different waste types and levels of risk, while promoting resource recovery and efficient use of existing infrastructure. The Project aligns with this direction by providing additional managed fill capacity that addresses identified constraints in the availability, location, and cost of disposal options.

The Project has been considered against the Canterbury Regional Policy Statement, the Canterbury Land and Water Regional Plan, the Canterbury Air Regional Plan, and the Operative Waimakariri District Plan. Overall, the Project is consistent with a number of provisions relating to waste management, infrastructure provision, air quality, and district-level land use, while also giving effect to the need for additional disposal capacity within the region.

At the regional level, the Project aligns with provisions supporting integrated waste management and efficient use of landfill capacity, including directing waste to facilities appropriate to their classification and improving the overall functioning of the waste management system. It is also assessed as consistent with provisions relating to air quality and natural hazards, where effects are considered to be appropriately managed. In relation to freshwater, modelling and design indicate that effects can be managed such that there is no material change to baseline water quality. However, some tension arises in relation to cultural values, including the relationship of Ngāi Tahu with freshwater and the appropriateness of the site within the catchment. The Applicant acknowledges that Ngāi Tūāhuriri has consistently expressed concerns regarding cultural values, mahinga kai, the Karetu River and the potential for adverse effects from contaminant discharges. These concerns, together with matters raised through the RMA notified consent process by the councils and submitters, have informed updates to technical assessments undertaken since the original resource consent applications were lodged. While differing views remain regarding the Project, the Applicant remains committed to ongoing engagement and to ensuring these matters are fully considered through the approvals process.

At the district level, the Project is generally assessed as consistent with the Operative Waimakariri District Plan, including provisions relating to rural land use, infrastructure, amenity, and environmental management. It also supports the long-term rehabilitation of the existing quarry site.

Overall, the Project is broadly aligned with the strategic direction of planning documents, while presenting some areas of tension, particularly in relation to cultural values.

**Any other matters the Minister considers relevant**

This section is particularly important for a project of this nature. The Project's regional significance lies not only in any single quantified economic output, but in the way it improves the functioning of Canterbury's waste management system. It provides a near-term, fit-for-purpose disposal option within an existing quarry void, supports more efficient urban development and infrastructure delivery, preserves higher-class landfill capacity, improves regional resilience and reduces the risk that disposal constraints become a limiting factor in development or environmental remediation projects. Collectively, these benefits extend beyond those captured in the economic assessment and contribute to the Project's wider regional importance.

Key additional relevant considerations include:

- Demonstrated and ongoing demand for Class 3 disposal capacity driven by infrastructure and urban development activity across Canterbury.
- Existing constraints in the current system, including limited acceptance criteria, intake limits and high costs at existing facilities.
- Providing a near-term, fit for purpose solution through the adaptive re-use of an existing quarry void, avoiding the need to establish a new greenfield disposal site.

- Preservation of finite Class 1 and Class 2 landfill capacity for waste streams requiring higher levels of containment.

- Improved resilience, competition and choice within Canterbury's waste disposal network through the availability of an additional Class 3 disposal option.

- Support for the relationship between disposal capacity and development activity reflected in feedback and letters of support received from industry and sector organisations involved in construction, infrastructure delivery, and land development across Canterbury. These parties identify the importance of accessible and cost-effective disposal capacity to the delivery of housing and infrastructure, and the role that the proposed facility would play in supporting development outcomes across the region.

In summary, the Project delivers regionally significant infrastructure benefits by addressing a recognised shortfall in compliant Class 3 managed fill capacity within Canterbury. Existing disposal options are constrained by acceptance criteria, operational limits, cost, and remaining consent duration, which is already contributing to development delays, increased costs, and compliance risks.

By providing additional, well-located disposal capacity, the Project supports the efficient delivery of housing, infrastructure, and commercial development across Greater Christchurch and Canterbury. The benefits extend beyond the site itself through reduced haulage distances, improved programme certainty, and increased resilience in the regional waste disposal network.

# 4. Section 22(1)(b)(i) Whether referral will facilitate the Project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes

Referral of the project under the FTAA will materially facilitate its delivery when compared with the standard Resource Management Act 1991 (RMA) processes. In particular, the FTAA pathway enables a more streamlined, timely, and cost-effective determination of approvals for a project that is regionally significant and likely to involve complex and contested issues.

The Project has already progressed through the RMA process to an advanced stage. Resource consent applications were lodged in April 2024, followed by public notification in September 2024. A total of 573 submissions were received, including a substantial number in opposition, with 89 submitters indicating a wish to be heard. The application has been on hold since.

This level of participation indicates that the Project is likely to involve a complex and contested hearing process if it were to proceed under the RMA. Based on the number of submitters and the breadth of issues raised, there is a high likelihood that any Council-level decision would be subject to appeal to the Environment Court, irrespective of the outcome at the hearing stage.

Experience with comparable projects demonstrates that, where large numbers of submissions are received and issues are complex or contentious, the RMA pathway is likely to involve extended hearing processes, appeals, and further stages of evidence exchange and mediation. Collectively, these steps can extend the approval timeframe significantly and introduce uncertainty into the delivery of the Project.

By contrast, referral under the FTAA enables a more streamlined and time-bound decision-making process through an expert panel. This materially reduces the duration of the approvals process and provides greater procedural and timing certainty for a project of this scale and complexity.

The difference in process efficiency is particularly relevant in the context of this project. As set out in section 22(1)(a), the proposal addresses an identified constraint in the availability of Class 3 disposal capacity within Canterbury. Delays in obtaining approvals will defer the realisation of the project's economic, infrastructure, and environmental benefits, including those identified in the independent Sapere assessment.

Furthermore, the Project is well positioned to proceed efficiently through the FTAA process. The application is supported by a comprehensive body of technical work, including detailed design, environmental

assessments, and responses to issues raised through the RMA process, including submissions and Council officer review (s42A RMA reports).

The Project is also well advanced in terms of implementation readiness. Access across Crown land has been secured through a Deed of Grant of Easement issued by Land Information New Zealand (LINZ) on 19 February 2026, providing certainty regarding legal access arrangements. Together with the substantial technical assessment, consultation and regulatory work already undertaken through the notified resource consent process, this demonstrates that the Project is well placed to progress efficiently through the Fast-track Approvals process.

The Project is therefore at a high level of readiness for substantive consideration. This will enable focused assessment of the key matters and support an efficient decision-making pathway.

Accordingly, referral of the project under the FTAA will facilitate its delivery by:

- Enabling a more timely determination compared with the RMA process
- Reducing the risk of extended appeal processes and associated delays
- Providing greater procedural and timing certainty for a regionally significant infrastructure project
- Allowing earlier realisation of the project's identified economic, infrastructure, and environmental benefits
- Supporting the prompt response to an identified constraint within the regional waste management system.

On this basis, referral of the project under the FTAA will facilitate the project in a manner that is both materially faster and more cost-effective than reliance on standard RMA processes.

# 5. Section 22(1)(b)(ii) Whether referral is unlikely to materially affect the efficient operation of the fast-track approvals process

The Project seeks resource consents only under the RMA and is well-suited to the fast-track process. It is unlikely to materially affect the efficient operation of that process.

An Authority under the Wildlife Act has been obtained for lizard management. No other regulatory approvals are required.

The factors that support this statement are outlined below.

The application is supported by a substantial body of work already undertaken through the RMA process. Resource consent applications were lodged in April 2024, followed by further information requests and responses, public notification, submissions, and preparation of section 42A officer reports. This provides a comprehensive evidential foundation and ensures that key issues relevant to the project have already been identified and articulated.

In addition to the formal RMA process, the project has been informed by pre-lodgement consultation and subsequent feedback from local authorities, iwi, and neighbouring parties. This material has been reviewed by the project team and relevant experts and will directly inform the preparation of a substantive FTAA application.

As a result of this advanced level of preparation, a substantive application could be submitted promptly following any referral decision. The application benefits from a well-developed evidence base and a clear understanding of the issues raised to date. This supports an efficient approval process by enabling early and focused consideration of the key matters, rather than requiring time to identify and scope those issues as part of the panel process.

In summary, this level of preparation supports efficient operation of the FTAA process by enabling:

- Early identification and clear articulation of the key issues for consideration

- A well-developed application that avoids the need for preliminary issue-scoping within the panel process
- Focused and efficient assessment by an expert panel, supported by an established evidence base.

The Project is also supported by an experienced team of technical specialists and advisors who are familiar with the application and the issues raised through the RMA process. This supports a responsive and coordinated approach to the FTAA process and reduces the risk of delay arising from information gaps or late-stage issue identification.

From an implementation perspective, the Project is capable of being progressed efficiently following approval. While some post-consent work is required, including final design certification and construction, these activities are known and well understood. The ability to bring the facility into operation within a relatively short timeframe following approval reinforces the value of an efficient approvals process.

Referral of the Project is consistent with the purpose and intent of the FTAA. The application is sufficiently advanced, the key issues are well understood, and the proposal is supported by a robust evidence base. The Project can therefore be considered without placing undue demand on the fast-track process or affecting its efficient operation.

Accordingly, the Project is unlikely to materially affect the efficient operation of the FTAA process and is well aligned with the process and timing expectations associated with that regime.

# Attachments

Letters of support

**Date: 30 January 2026**

**Subject: Whiterock Class 3 Managed Fill Proposal Introduction:**

My name is Harley Haywood and I am the Managing Director of Utilities Infrastructure New Zealand Limited, and the Chairman of the Canterbury/Westland Branch of Civil Contractors New Zealand (CCNZ).

I am writing this letter at the request of Whiterock Lime Limited to provide context around the challenges of the cleanfill and contaminated soil markets, and the critical need for projects such as this in the Canterbury Market.

Please note that my analysis/endorsement is not limited nor exclusive to Whiterock Lime – but any like for like project in the Canterbury region.

**Project Overview**

My understanding is that Whiterock is a joint venture of various Industry players (including Protranz and Road Metals) seeking consent to operate a Class 3 Managed Fill facility within the former Ravensdown Lime Quarry at Loburn. The proposal provides a purpose-designed, compliant disposal option to service construction, infrastructure and land-development activity across Canterbury.

**Strategic Need**

Construction and infrastructure delivery in Canterbury is increasingly constrained by a critical shortage of compliant cleanfill, hydrovac and managed fill disposal capacity, particularly close to Christchurch.

This lack of permitted sites is a recognised compliance and delivery issue for the civil construction sector and has been consistently raised by contractors and industry bodies, including Civil Contractors New Zealand (CCNZ) and the Aggregate and Quarry Association (AQA).

The shortage has resulted in:

1) Increased cartage distances and costs, with material currently transported to South Canterbury and the West Coast
2) Delays to housing and infrastructure enabling works
3) Higher transport-related emissions
4) Inefficient use of Class 1 landfill capacity (e.g. Kate Valley) for largely inert materials
5) Increased non-compliant disposal and fly-tipping (a significant environmental risk in my opinion).

Any proposal that delivers well-located, consented managed fill capacity close to Christchurch provides a material benefit to the construction industry (capturing residential and commercial infrastructure) irrespective of the individual operator. The Whiterock proposal directly addresses this recognised bottleneck by providing fit-for-purpose capacity, close to demand, within a tightly controlled consent framework.

**Key Benefits**

Enabling Infrastructure Delivery

1) Provides essential disposal capacity to support roading, subdivision and civil works
2) Reduces programme risk and cost uncertainty for major projects

Economic and Productivity Gains

1) Improves system-wide efficiency across the Canterbury construction sector
2) Reduces haulage distances and costs, improving contractor productivity
3) Supports industry-wide compliance through increased access to permitted disposal capacity

Environmental Improvements

1) Reduced heavy vehicle travel and associated emissions

2) Progressive rehabilitation delivering stable landforms and improved post-use outcomes

Best-Practice Environmental Management

1) Acceptance of approved managed materials only
2) Strict material acceptance criteria, monitoring and compliance controls
3) Purpose-designed stormwater, erosion and sediment management systems

**Alignment with Fast-track Objectives**

The Whiterock Managed Fill Facility aligns with Fast-track principles by:

- Supporting regional and national infrastructure delivery
- Delivering clear economic and productivity benefits
- Providing environmentally preferable outcomes compared to the status quo
- Being shovel-ready, well-defined and capable of timely implementation

**Conclusion**

The Whiterock Managed Fill proposal responds to a widely acknowledged, industry-level constraint affecting construction and infrastructure delivery in Canterbury. It provides immediate, compliant disposal capacity that improves environmental outcomes, supports contractor compliance, and enhances sector productivity within a robust and well-managed framework.

Your sincerely



**Harley Haywood | Chairman**

**Canterbury Westland Branch | Civil Contractors New Zealand M:** s 9(2)(a)

| **W:** www.civilcontractors.co.nz

CORDE®

Trusted Connections

TO WHOM IT MAY CONCERN

My name is Mathew Havill and I am the CEO of CORDE, a large contractor based in Canterbury.

Whilst we are neutral to the specific Whiterock Managed Fill Proposal in itself, I wish to express my support for the development of class 2 and class 3 disposal facilities in and around Canterbury.

The efficiency of the construction and development sector is closely linked to the availability of supporting infrastructure, including compliant disposal facilities. Where these are constrained, there are measurable impacts on project timing, cost, and ultimately economic activity.

Increasing disposal capacity through proposals like Whiterock would improve productivity across multiple sectors by reducing delays and inefficiencies. This has a multiplier effect, enabling projects to proceed more quickly and with greater cost certainty.

These outcomes are particularly important in a growth context, where housing, infrastructure, and commercial development are all required to keep pace with demand.

The proposal (and proposals like it) represents a practical and necessary response to an existing constraint within the system, and I support their advancement.

Yours faithfully



Mathew Havill
CEO

To whom it may concern

I have worked in the construction industry for many years and bring extensive knowledge and experience in this area. Christchurch is a thriving and growing city, and I am committed to seeing that growth continue in a sustainable and well-managed way.

I remain neutral on the Whiterock Managed Fill proposal and do not wish to comment on its commercial or environmental merits. However, I strongly support the appropriate development of consented Class 3 managed fill facilities (see attached for reference), recognising the significant environmental and economic benefits they provide.

It is important that these infrastructures are located as close to Christchurch as possible. Transporting soils up to 160 km for appropriate disposal is inefficient, costly, and contributes unnecessarily to greenhouse gas emissions and increased congestion on our road network.

The efficiency of the construction and development sector is closely linked to the availability and proximity of supporting infrastructure, including aggregates and compliant disposal facilities. Where these are constrained, the costs are distributed to everyone down the line.

There will always be a need for KV to take asbestos and hydrocarbon waste, but mere Class 3 waste should be allowed to be dumped elsewhere.

I certainly support additional competition in this area. Increasing disposal capacity through proposals such as Whiterock would undoubtedly improve productivity across multiple sectors by reducing delays and inefficiencies, assuming availability of the site to the wider sector.

This has a multiplier effect, enabling projects to proceed more quickly and with greater cost certainty regarding haulage.

In summary, while I support the availability of alternative landfill options, they should be designed and built to the appropriate environmental standard.

Specifically, these landfills should not be upgraded to Class 1 or Class 2 without the appropriate design and environmental compliance and should have a caveat in place to prohibit a change in classification.

Kind regards



Phil Mauger

**Table 2: Types of disposal facilities, transfer stations and their levy and reporting obligations**

| Landfill class | Levy and reporting obligations |
|---|---|
| **Class 1: Municipal disposal facility**<br>Accepts any of the following:<br>• household waste<br>• waste from commercial or industrial sources<br>• waste from institutional sources (eg, medical waste)<br>• green waste<br>• waste that is not accepted at the other types of landfills below. | • Must already be reporting on waste and paying the waste disposal levy, and activity category reporting from 1 July 2024.<br>• 1 July 2024 – $60 per tonne<br>• 1 July 2025 – $65 per tonne<br>• 1 July 2026 – $70 per tonne<br>• 1 July 2027 – $75 per tonne |
| **Class 2: Construction and demolition fill disposal facility**<br>Accepts waste from construction and demolition activities.<br>Does not accept class 1 waste. | Must already be reporting on waste and paying the waste disposal levy, and activity category reporting from 1 July 2024.<br>• 1 July 2024 – $30 per tonne<br>• 1 July 2025 – $35 per tonne<br>• 1 July 2026 – $40 per tonne<br>• 1 July 2027 – $45 per tonne |
| **Classes 3 and 4: Managed or controlled fill disposal facilities**<br>Accepts any of the following:<br>• inert waste material from construction and demolition activities<br>• inert waste material from earthworks or site remediation.<br>Does not accept class 1 or 2 waste. | Must already be reporting on waste and paying the waste disposal levy, and activity category reporting from 1 July 2024.<br>• 1 July 2024 – $10 per tonne<br>• 1 July 2025 – $15 per tonne<br>• 1 July 2026 – $15 per tonne<br>• 1 July 2027 – $20 per tonne |
| **Class 5: Cleanfill**<br>Accepts only virgin excavated natural material (such as clay, soil or rock) for disposal.<br>Does not accept class 1, 2, 3 or 4 waste<br>Does not accept hardfills (eg, concrete, brick, asphalt, pavers, tiles or ceramics) | Must already be reporting on waste.<br>Activity category reporting from 1 July 2024.<br>Waste levy does not apply. |

Surfacing Solutions Limited

1030 Main North Road

Christchurch

8083

08/05/26

To Whom it may concern,

My name is Ben Porter-Hardy and I am the General Manager of Surfacing Solutions Limited, and Surfacing Supplies Limited. We are one of four Asphalt Plant operators in Christchurch and are involved in surfacing works across a full range of residential, commercial, and council developments throughout Canterbury and the wider South Island.

We support the Whiterock Managed Fill proposal and wish to see it progress to operational status as soon as possible.

From a surfacing contractor perspective, we often encounter contaminated materials – most notably coal tar. Currently, our only options for disposal of this material is South Canterbury, the West Coast, or via Kate Valley. The tight constraints on the disposal of contaminated material and distance to disposal locations creates delays but also increases the costs and complexities of the projects we are involved in.

The availability of reliable and compliant disposal capacity is becoming a critical constraint on project delivery for ourselves and our clients.

The Whiterock proposal directly addresses this issue. By increasing regional disposal capacity and allowing for the waste to be directed to the most suitable site it would reduce programme risk, improve efficiency of construction and surfacing operations and allow projects to proceed with greater certainty.

In practical terms, improved disposal capacity enables more efficient delivery of housing subdivisions, infrastructure upgrades, and commercial developments.

The progression of this project is critical to keep market prices fair and reasonable, and I strongly support its progression.

Regards



Ben Porter- Hardy

General Manager

Surfacing Solutions Ltd

s 9(2)(a)

s 9(2)(a)

2 February 2026

Ministers Assessing Regional Significance,

Minister for Infrastructure

Dear Ministers,

**Re: Whiterock Class 3 Managed Fill Proposal**

We are writing to express our support for the joint venture of industry players (including Road Metals) seeking consent to operate a Class 3 Managed Fill facility within the former Ravensdown Lime Quarry at Loburn. The proposal provides a purpose-designed, compliant disposal option to service construction, infrastructure and land-development activity across Canterbury.

## Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce around 47 million tonnes of aggregates and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates and assist in developing a highly skilled workforce within a safe and sustainable work environment.

Construction and infrastructure delivery in Canterbury is increasingly constrained by a critical shortage of compliant cleanfill, hydrovac and managed fill disposal capacity, particularly close to Christchurch. Quarries require clean fill for reprocessing and/or rehabilitation and currently we are seeing inefficient use of Class 1 landfill capacity (e.g. Kate Valley) for largely inert materials.

## Key benefits

Key benefits of this proposal include:

- Provides essential disposal capacity to support roading, subdivision and civil works,
- Supports industry-wide compliance through increased access to permitted disposal capacity,
- Reduced heavy vehicle travel and associated emissions
- Improves system-wide efficiency across the Canterbury construction sector
- Strict material acceptance criteria, monitoring and compliance controls

Any proposal that delivers well-located, consented managed fill capacity close to Christchurch provides a material benefit to the construction industry (capturing residential and commercial infrastructure) irrespective of the individual operator.

The Whiterock Managed Fill directly addresses this recognised bottleneck by providing fit-for-purpose capacity, close to demand, within a tightly controlled consent framework.

The proposal also responds to a widely acknowledged, industry-level constraint affecting construction and infrastructure delivery in Canterbury. It provides immediate, compliant disposal capacity that improves environmental outcomes, supports contractor compliance, and enhances sector productivity within a robust and well-managed framework.

Yours sincerely,



**Wayne Scott**
**Chief Executive Officer**
Aggregate and Quarry Association
s 9(2)(a)
s 9(2)(a)

LucasHaining

Lucas Haining Ltd
122 Victoria Street
Christchurch Central 8013

1st May 2026

Tēnā koe,

I am the Director of Lucas Haining, a company who specialise in the delivery of large scale and complex construction projects for private and public sector clients. I am writing to support the Whiterock Managed Fill proposal based on direct experience managing numerous large civil construction and land development projects across the wider Canterbury region over a 20-year period.

One of the most consistent challenges we face is securing reliable and cost-effective disposal of contaminated material. Limited capacity, constrained delivery windows and cartage requirements often result in having to cart material over extended haul distances which results in increased costs, and disruption to construction sequencing. I have witnessed this on numerous occasions. Facilities designed to accept Class 1waste impose un-necessary costs on developments with Class 3 contaminants.

The Whiterock facility would provide a practical solution to these challenges. Having a specific Class 3 managed fill which is centrally located with the Canterbury market will improve logistics, reduce travel times, and allow works to proceed more smoothly.

From a project delivery perspective, this translates into fewer delays, better cost control, and improved outcomes for clients. These benefits extend beyond individual projects and enable the efficient delivery of cost-effective housing and infrastructure across the region.

Nāku noa, nā

Dan Lucas

s 9(2)(a)

55 Lunns Road
P.O. Box 20-047
Bishopdale,
Christchurch
PH 0800 4 SCHICK

Monday, May 11, 2026

Road Metals
Via Email
C/- Jared Johnstons 9(2)(a)

**Letter of Support – Whiterock Managed Fill Proposal**

To whom it may concern,

My name is Sam Paterson, and I am the South Island Manager of Schick Civil Construction Limited. We work across Canterbury on a wide range of urban development projects. I am writing to support the Whiterock Managed Fill proposal and to say we would like to see it up and running as soon as possible.

From our point of view as a contractor, having reliable and compliant places to take soil and fill is becoming a real issue for getting projects done on time. More and more, delays are happening not because of the work itself, but because there are limited lawful disposal options. On top of that, sending material to less suitable sites like Kate Valley adds major transport costs and is not generally the right fit for Class 3 contaminated soils and aggregates.

The Whiterock proposal would help address that. By increasing disposal capacity in the region and making it easier to send waste to the most suitable site, it would reduce programme risk, make earthworks more efficient, and give projects more certainty. It would also help bring costs down, which are currently being pushed up by long haulage distances, delays from restrictive delivery requirements, and limited competition between disposal sites driving higher gate fees.

In practical terms, better disposal capacity helps with the smooth delivery of housing subdivisions, infrastructure upgrades, and commercial developments. Without that supporting infrastructure in place, the industry's ability to deliver this work at the scale needed is seriously limited.

Overall, this proposal is an important part of supporting the wider Canterbury construction market and helping keep pricing fair and reasonable. For those reasons, I strongly support it progressing.

Regards,

**Sam Paterson**
**South Island Manager – Schick Group**
s 9(2)(a)
s 9(2)(a)

To whom it may concern,

My name is Hamish Wright and I am the owner and director of CCL, and several large residential and urban developments across the Wider Christchurch Area.

I am writing to support the Whiterock Managed Fill proposal, particularly in the context of housing delivery across the region.

Residential development requires the efficient handling of bulk earthworks and site preparation. At present having to cart Class 3 soils and aggregates to site that are specifically built for Class 1 material, such as Kate Valley, or a long distance away, is adding to the cost of our projects. This results in higher development cost and inflated housing prices.

The availability of additional managed fill capacity would help streamline site preparation, reduce haul distances, and lower overall costs. These savings are material and ultimately flow through to the end cost of housing.

More importantly, improved disposal infrastructure supports the pace at which land can be developed and brought to market. In a constrained housing environment, this is a significant benefit.

The Whiterock proposal should be viewed as enabling infrastructure that supports broader housing outcomes, rather than as a standalone activity.

I support the proposal accordingly.

Kind Regards

Hamish Wright

Managing Director



7th May 2026

DEVCORP
CONSTRUCTION

To whom it may concern,

My name is Jonny Mitchell, and I am a co-owner and Director of Devcorp, a large scale civil and vertical construction company and developer, operating within the Canterbury market.

I am writing to support the Whiterock Managed Fill proposal, particularly in the context of housing and industrial delivery across the region.

Urban development requires the efficient handling of bulk earthworks and site preparation. At present having to cart Class 3 soils and aggregates to sites that are specifically built for Class 1 material, such as Kate Valley, or a long distance away, is adding to the cost of our projects. This results in higher development costs and inflated housing prices.

The availability of additional managed fill capacity would certainly help streamline site preparation, reduce haul distances, and lower overall costs. Improved disposal infrastructure supports the pace at which land can be developed and brought to market. In a constrained housing environment, this is a significant benefit.

The Whiterock proposal should be viewed as enabling infrastructure that supports broader housing and development outcomes, rather than as a standalone activity.

I support the proposal on this basis.

Kind Regards,

Jonny Mitchell

Devcorp Ltd

MAUGERS
CONTRACTING

07/05/2026

Good morning,
My name is Brittany Mauger, co-owner of Maugers Contracting. We have over 50 years of experience in Christchurch and specialise in subdivision, earthmoving, greenwaste, and construction markets.

I support the Whiterock Managed Fill proposal and wish to see it progress to operational status as soon as possible.

From a contractor's perspective, the availability of reliable and compliant disposal capacity is becoming a critical constraint on project delivery. Increasingly, projects are facing delays not because of construction challenges, but due to limited options for lawful disposal of soils and fill materials, and the incredible cost of delivery to sub-optimal sites such as Kate Valley, which is not suitable for Class 3 contaminated soils and aggregates.

The Whiterock proposal directly addresses this issue. By increasing regional disposal capacity and allowing for the waste to be directed to the most suitable site it would reduce programme risk, improve efficiency of earthworks operations, and allow projects to proceed with greater certainty. This has a direct flow-on effect to project costs, which are currently being inflated by haulage distances, delays due to specific delivery requirements, and limited competition in disposal options which increased gate fees.

In practical terms, improved disposal capacity enables more efficient delivery of housing subdivisions, infrastructure upgrades, and commercial developments. Without this supporting infrastructure, the ability to deliver these outcomes at scale is significantly constrained.
This proposal represents an important enabling component of the wider construction market across Canterbury, and the ability to keep market prices fair and reasonable, and I strongly support its progression.

Regards,

**BRITTANY MAUGER**
Director/HR Manager

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