

## Bylaw Hearings Panel MINUTES ATTACHMENTS

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**Date:** Wednesday 12 March 2025  
**Time:** 9:30 am Parks & Reserves / Trade Waste  
**Venue:** Parks & Reserves Bylaw / Trade Waste Bylaw  
Committee Room 1, Level 2, Civic Offices,  
53 Hereford Street, Christchurch

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# Draft Trade Waste Bylaw 2025

## Hearings Panel

12 March 2025

# Context and Review Process

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## Context

**Trade waste:** waste from commercial and industrial activities which is disposed of through the wastewater network.

[Trade Waste Bylaw 2015](http://www.ccc.govt.nz) - see [www.ccc.govt.nz](http://www.ccc.govt.nz)

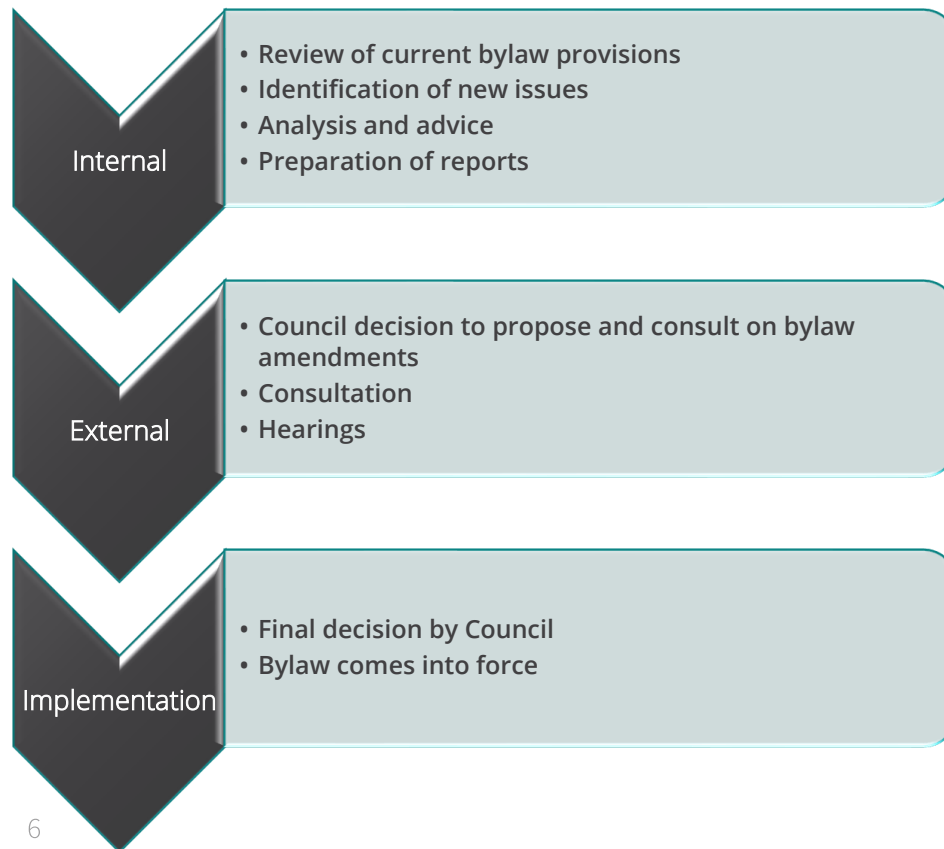
- Made under legislation – LGA s145 and 146.
- Framework for trade waste consents & basis for charging and monitoring.
- Rules that the Council has powers to enforce.
- **Bylaw purpose:** to protect both the wastewater and stormwater networks, public health and the environment.

## Our trade waste dischargers

- 1,583 trade waste consents.
- Spread, with concentrations in central city (171), Hornby (134), Bromley (85), Harewood (83), Sockburn (82), and Sydenham (78).

Category	Number	Volume	Contaminants	Current Fees and Charges
Permitted	1,220	<1,245m <sup>3</sup> /year	Will meet limits in Schedule 1A	\$245 per year
Annual Conditional	140	<1,245m <sup>3</sup> /year	Are likely NOT to meet limits in Schedule 1A	\$420 per year
Quarterly Conditional	177	>1,245m <sup>3</sup> /year	Are likely NOT to meet limits in Schedule 1A	Assess discharge by volume and contaminants on a quarterly basis and charge accordingly.  Volume rates are \$1.15/m <sup>3</sup> (peak) and \$0.58/m <sup>3</sup> (off-peak). Contaminant rates are variable and outlined in the Schedule of Fees & Charges.
Tankerred	53	Trade waste which is transported by vehicle and disposed of at the Trade Waste Reception Facility.		Assess discharge load by volume and charge accordingly. Volume rate is \$61/m <sup>3</sup> .

## Bylaw Review Process



- Must review by 26 November 2025
- Process set by the Act.
- Commenced early 2024.
- Anticipate completion by mid 2025.

We are here

## Review findings – section 155 report

- Current bylaw is largely still fit for purpose.
- Proposed changes to address identified gaps or emerging issues.
- Purpose of proposed amendments:
  - manage discharge characteristics which are problematic for the wastewater network or the environment
  - align with best practice
  - improve and strengthen consent decision making
  - better manage permitted consents
  - clarify the intent of the bylaw

## What we proposed – key changes



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- Stricter limits on specific contaminants within discharges  
*A reduced maximum concentration of inorganic mineral solids; and specifying POPS (PFAS, PFOA and PFOS) as prohibited.*
- A requirement for trade waste consent for dewatering discharges to the wastewater network.



## What we proposed – key changes



- Introducing a term of duration for permitted consents.
- Strengthening the application process and consent decision making processes
- Improving regulation of tankered waste consents.

## Local Water Done Well

### Local Government (Water Services) Bill introduced

- Earlier review of bylaw (2-step process)
- No transitional provisions to delay current legislative review requirement.

### Wastewater Environmental Performance Standards proposed

- Focus on CWTP and resource consent to discharge to the environment.
- Do not include requirements for trade waste.
- Note draft bylaw contains broad provisions that could respond to WEPS, if required.

Proceeding now to meet current legislative requirements.

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## Consultation

- Early engagement, Aug – Nov 2024.
- Open for feedback 11 Nov 2024 – 12 Jan 2025.
- Over 2,500 stakeholders directly contacted, including all trade waste consent holders.
- Webinar – 26 November.
- Support from Minister of Health (statutory consultee).
- 24 submissions received.

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# Feedback on proposals

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## Listing POPs (including PFAS, PFOA and PFOS) as prohibited characteristics of trade waste discharge



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- Support largely split along the lines of submitter category – those that opposed were all trade waste consent holders.
- Reasons for opposition include:
  - practicality of prohibition
  - misalignment with guidance
  - uncertainty for business continuity
  - unintended consequences
- A number suggested a maximum allowable limit of PFAS as an alternative to prohibition.

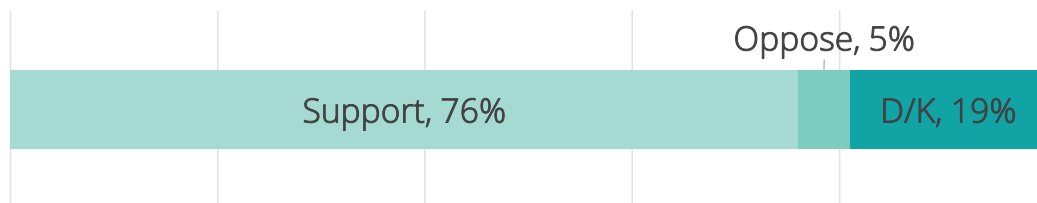


## Reducing maximum concentration of trade waste discharges of inorganic mineral solids



- Reasons for opposition include the levels being unattainable or excessively reduced and the impacts and expense on business.
- Two submitters queried the compliance timeframes and support for businesses to comply.
- Some submissions highlighted the proposal was not clear / interpreted as intended.

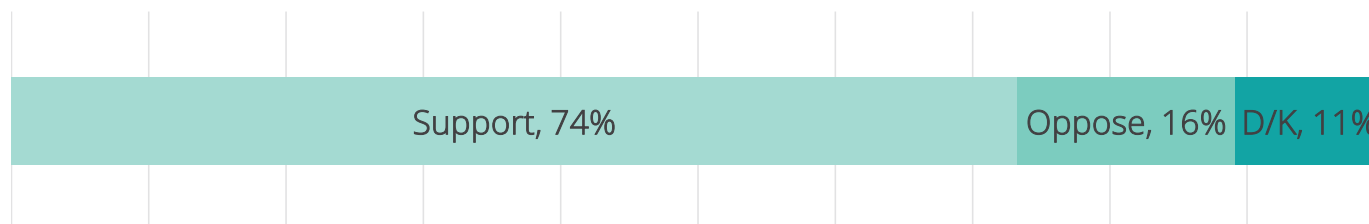
## Dewatering to the wastewater network (clarification of requirement for trade waste consent)



- Support across all stakeholder groups.
- One submitter opposed.
- One submitter requests change to bylaw to indicate this should also apply in circumstances where no stormwater network is available.



## Term of Duration for Permitted Consents (consent expiry)



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- Suggestions included:
  - A shorter (5 year) maximum term
  - Increased monitoring and reporting requirements
  - a staged transition for existing consents.
- Concerns raised:
  - business continuity
  - administrative burden and costs

## Strengthening application processing and decision-making provisions



### Changes proposed:

- including wider matters that may be considered.
- removing the application processing times from the bylaw and communicate processing time targets in other ways.
- including reasons we may decline an application.

- Majority support, in full or in part.
- Three submitters concerned about the extent of the wider matters that could be considered in application processing and the potential for delays.
- Two submitters opposed the application processing timeframe change, with one suggesting an extended timeframe instead.

## Tankered waste amendments



### Changes proposed:

- specify the types of waste that can be accepted or refused
  - include the ability to recover costs for any damages
  - Requirements to:
    - keep records of deliveries accepted
    - provide connections
    - adhere to CWTP conditions of entry
- Majority support, in full or in part.
  - Refusal of some wastes - submitters noted a need for an avenue for disposal.





## Other suggestions

- Increase the maximum annual discharge volume.
- Amend definitions (dewatering and trade waste).
- Reclassify other prohibited characteristics so they are not strictly prohibited (asbestos, organochlorine pesticides and organotin).



Pātai /  
Questions?

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# CCC Proposed Trade Waste Bylaw 2025

Fuel Companies Submission

March 2023





## Background – PFAS

- The consultation draft of the Trade Waste Bylaw listed a discharge containing any amount of poly - and per fluoroalkyl substances (PFAS) as having a prohibited characteristic (Schedule 1B.2.2).
  - Note: this was captured under 1B.2.2 as Persistent Organic Pollutants (POPS), including polyfluoroalkyl substances (PFAS), perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA).
- Discharges containing prohibited characteristics are not allowed to be discharged to trade waste.
- The consultation draft did not appear to allow discharge of PFAS by means of a conditional consent.



## Fuel Companies Submission – PFAS

- The Fuel Companies requested that PFAS, specifically;
  - perfluorooctane sulfonate (PFOS)
  - perfluorooctanoic acid (PFOA)
  - perfluorohexane sulfonic acid (*PFHxS*).be included in Schedule 1A Permitted Discharge Characteristic.
- These PFAS are listed as POPS and are currently controlled under the Hazardous Substances and New Organisms Act 1996, and associated Regulations and Notices.





## Basis of the Submission – PFAS

- PFAS are widespread in the environment and are therefore likely to be present in trade waste.
- This includes PFAS in water generated during dewatering that is discharged to trade waste.
- Total prohibition of PFAS in trade waste implies a PFAS concentration of zero. This is not enforceable, as analytical laboratories provide results to a numerical limit of reporting (LOR) or Practical Quantification Limit (PQL), which are greater than zero.
- A practical means of limiting the amount PFAS in trade waste is to establish permitted concentration and/or mass limits.
- Guidance is currently available in New Zealand to calculate risk-based concentrations and mass limits to allow the environmentally responsible disposal of PFOS, PFOA and PFHxS in trade waste.
- This approach is applied to trade waste in some parts of New Zealand.



## Current Draft – PFAS

The current draft of the Bylaw provides for:

- Schedule 1B - Discharge of trade waste containing prohibited characteristics if subject to a conditional consent in accordance with clause 13(4)
  - Clause 13(4) states - The Council may, at its discretion, approve a discharge which contains a prohibited characteristic if the prohibited characteristic can be treated to a level where the Council is satisfied a conditional trade waste consent is appropriate.
- A conditional consent is subject to conditions set out in Clause 14.
- Clause 1B.2.2(h) has been amended as;
  - A discharge has a prohibited characteristic if it has any amount of: Polyfluoroalkyl substances (PFAS), including perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA) and perfluorohexanesulfonic acid (PFHxS) **in excess of the levels recommended by the Environmental Protection Authority, or the Ministry for the Environment.**

Explanatory note: Current guidance is outlined in: PFAS Disposal to Trade Waste (Environmental Protection Authority, 2018) and Advice for Councils – PFAS (Ministry for the Environment, 2018).



## Conclusion – PFAS

- The Fuel Companies agree that permitting the discharge of PFOS, PFOA and PFHxS in trade waste by a conditional consent as proposed, is appropriate and acceptable.
- We request however, that the current wording of 1B.2.2(h) be amended as follows.
- Polyfluoroalkyl substances (PFAS), ~~including~~ comprising perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA) and perfluorohexanesulfonic acid (PFHxS) in excess of the levels as determined by Christchurch City Council based on Guidance recommended by the Environmental Protection Authority, ~~or the Ministry for the Environment.~~
  - Reason - PFOS, PFOA and PFHxS are the only PFAS regulated as POPs in New Zealand and information is available to determine appropriate risk-based levels for discharge in trade waste.
  - Reason – We suggest EPA as the regulatory organisation for POPs.
  - We also note the relevant information is available in the PFAS National Environmental Management Plan 3.0 Heads of EPA Australia and New Zealand HEPA 2025.



## Fuel Companies Submission – Carwash Discharges

- Submission sought to increase maximum discharge limit (Schedule 1A.2.1) from 1,245m<sup>3</sup> annually (equates to approx. 3.4m<sup>3</sup> per day) to 5m<sup>3</sup> per day (including weekends).
- Fuel Companies operate carwashes in accordance with their own trade waste management plans. Carwash discharges will generally meet the water characteristics thresholds set out in Schedule 1A of the Bylaw, carwashes which operate 7 days a week (which is most of them) will likely exceed the annual discharge volume limit (1,245m<sup>3</sup>).
- Therefore, the 'effects' being debated relate to the quantity, and not the quality, of trade waste discharges.



## Response to Council's Feedback – Carwash Discharges

- The hearings panel rejected the Fuel Companies' submission point.

Hearing Panel's reasoning	Fuel Companies' response
<p><i>The 1,245m<sup>3</sup> limit is considered reasonable for small businesses.</i></p> <p><i>Capacity of our network may have been assessed on the basis of the 1,245m<sup>3</sup> per year limit for many sites.</i></p> <p><i>Potential impacts on capacity of the network to handle the additional demand.</i></p>	<p>The 1,245m<sup>3</sup> annual limit equates to approx. 3.4m<sup>3</sup> per day which is significantly lower than the 5m<sup>3</sup> threshold adopted in Trade Waste Bylaws throughout the country including Dunedin, New Plymouth, Palmerston North, Napier, Wellington or Auckland (10m<sup>3</sup> threshold).</p> <p>No evidence was provided in the draft Bylaw's supporting material as to why CCC is imposing a stricter volume limit than other bylaws around the country.</p>



## Response to Council's Feedback – Carwash Discharges

Hearing Panel's reasoning	Fuel Companies' response
<i>A higher limit would reduce incentives for companies to conserve water (for example, water reuse systems for car washes)</i>	<p>The 3.4m<sup>3</sup> per day discharge volume threshold is typically very difficult to meet for carwash operators, even with best practice measures in place. As such, a 3.4m<sup>3</sup> would provide limited incentive.</p> <p>In the Fuel Companies' experience, a 5m<sup>3</sup> per day limit is achievable through operating carwashes in accordance with best practice measures. Therefore, there would be incentive to meet this, and the relevant characteristic thresholds, in order to achieve a permitted pathway.</p> <p>Significant measures are in place to conserve water at carwashes. The bp carwash network for example recycles 65-90% of water from a carwash cycle.</p>





## Relief Sought – Carwash Discharges

- The Fuel Companies seek that Schedule 1A.2.1 is amended to either:
  - Provide a permitted pathway for car wash discharges where Council is provided with a trade waste management plan and the volume does not exceed 5m<sup>3</sup> per day.

OR

- Replace the 1,245m<sup>3</sup> annual volume limit with a 5m<sup>3</sup> daily volume limit.



# Styx Living Laboratory Trust

## Styx Vision 2000 – 2040 (CCC)

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## General Comments

## Recommendations





**ENVIRO NZ SERVICES LTD**  
**Comments to hearing on the Christchurch City Council**  
**Draft Trade Waste Bylaw 2025**

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**Introduction:**

1. Thank you for the opportunity to speak to this hearing. My name is Wayne Plummer. I am General Manager, Technical Services at Enviro NZ Services Limited (Enviro NZ). I am responsible for the operation of the company's two liquid and hazardous waste treatment facilities. Located in Auckland and here in Christchurch.
2. The Christchurch Technical Services liquid and hazardous waste treatment facility (formerly called ChemWaste) is located at 10 Barton Street, Woolston. This facility has a Conditional Trade Waste Consent.
3. This facility provides industrial services including vacuum tanker liquid waste collection, liquid and hazardous waste treatment and disposal. In addition it has utilised granulated activated carbon treatment to remove PFAS residues from industrial wastewaters such as firefighting equipment and contaminated production plant.

**Key Issue in Respect of the Draft Trade Waste Bylaw**

4. I don't intend to repeat EnviroNZ's submission, rather just address the key issue we think require council's further consideration.

**Prohibited Substances**

5. Enviro NZ's key concern within the draft bylaw is the blanket prohibition of Persistent Organic Pollutants (POPS), including PFAS, PFOS and PFOA.
6. These substances are listed as a "prohibited characteristic" in Schedule 1B.2.2. They would therefore not be consentable in a trade waste discharge, in accordance with clause 8(1)(d) of the Draft Bylaw.
7. The current Enviro NZ Technical Services Christchurch Conditional Trade Waste Consent has the following discharge limits:
  - PFOS 0.1 µg/litre (100 ng/litre or 100 ppt)
  - PFOA 0.1 µg/litre (100 ng/litre or 100 ppt)
8. Including persistent organic pollutants (POPs), which includes PFAS, PFOS and PFOA in the Schedule 1B.2.2 list of "prohibited characteristics" means that the current Conditional Trade Waste Consent that regulates these substances may not be able to be renewed.

9. These compounds are ubiquitous in household products including cleaners, clothing and furniture fabrics, personal care products like shampoo and cosmetics. As a result they are already present in refuse, landfill leachate, wastewater and trade waste.
10. In EnviroNZ's view it is not appropriate to place a blanket on substances that are already present in trade waste as it may make their control and management, to protect the wider environment, more difficult.
11. As an alternative it is suggested that the "prohibited characteristic" be restricted to PFAS, PFOS and PFOA only when they are present at concentrations in excess of guideline levels published by the Ministry for the Environment or Environmental Protection Agency.
12. This would allow the council to grant consent and better control these substances within a framework that recognises the appropriate current guidelines or standards for environmental discharges.

**Summary**


13. In summary:
  - PFAS, PFOS and PFOA are already in trade waste from a variety of sources;
  - A blanket prohibition on these substances may make their control more difficult;
  - The "prohibited characteristic" should be restricted to concentrations in excess of the appropriate environmental standard or guideline levels.
14. I'm happy to answer questions.

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**TO:** Bylaw Hearings Panel  
Hearing of Submission on the Proposed Trade  
Waste Bylaw 2025  
C/o Christchurch City Council  
53 Hereford Street  
Christchurch  
*Statement lodged by email – [david.corlett@ccc.govt.nz](mailto:david.corlett@ccc.govt.nz)*

**STATEMENT ON:** Proposed Trade Waste Bylaw 2025

**STATEMENT BY:** Winstone Wallboards Limited

**SUBMITTER ADDRESS:**   
Christchurch 8022

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#### HEARING STATEMENT

##### Introduction

1. RMG acts for Winstone Wallboards Limited (“**WWB**”) in this matter.
2. This statement is provided in support of WWB’s submission to the Proposed Trade Waste Bylaw 2025. The statement is in lieu of attendance at the Hearing scheduled to commence at 9:30 am on 12 March 2025.
3. As outlined in their submission, WWB is generally supportive of Proposed Trade Waste Bylaw 2025, furthermore, WWB is supportive of Council Officers’ recommended amendment that generally addresses the matter raised in WWB submission.
4. This statement sets out the following:
  - a. Brief overview of WWB Submission
  - b. Assessment and Support of Officer Recommendations
  - c. Further relief still sought
  - d. Summary and conclusion

#### Overview of Winstone Wallboards Limited Submission

5. **WWB** lodged a submission to Draft Trade Waste Bylaw 2025 ("**DTWB**"). A full copy of the submission is attached to this statement for the assistance of the Panel (**Attachment 1**).
6. WWB is the largest manufacturer and distributor of gypsum plasterboard, drywall systems, associated products and services in the country. The company has a strong environmental ethos particularly ensuring that waste is minimized and recycled wherever practicable.
7. WWB generally supports the Council and the overall purpose of the revised DTWB to control and monitor trade waste discharges into the public wastewater network in order protect public health and the environment.
8. However, WWB's key concern is to ensure that the definition of 'Trade waste' and the associated 'Explanatory note' does not have unintentional consequences in terms of the capturing non-trade waste from a Trade Premises and therefore resulting in the unnecessary requirement for a Trade Waste Discharge Consent as currently worded.
9. Therefore, WWB sought the following amendments to the definition of 'Trade waste'
  - (a) **amend the explanatory note** to ensure the non-trade wastewater, such as the water from the toilets, showers and kitchens of the non-trade activities on their Trade Premises site are not captured by the definition of 'Trade waste', resulting in the unnecessary requirement to obtain a Trade waste discharge consent.
  - (b) **seeks an exemption** be inserted to the definition of 'Trade waste' for stormwater discharges that have already been captured by other regulatory mechanisms, such as regional council discharge consents. This would eliminate unnecessary duplication of consenting, both in terms of costs, processing and monitoring.

#### Assessment and Support of Officer Recommendation

10. We have reviewed the Bylaw Hearings Panel Agenda, including **Attachment B: SUMMARY OF SUBMISSIONS AND ADVICE TO SUPPORT HEARINGS PANEL DELIBERATION ON THE PROPOSED TRADE WASTE BYLAW 2025**.
11. With respect to the amendments sought by WWB in (a) and (b) above, the Council Officer states that *"The submitter is not a trade waste consent holder, and the requirement for a trade waste consent does not apply in this instance. While they have a trade waste process on site, as far as we are aware, waste is reused and not discharged to the wastewater network. The proposed amendment is not recommended by staff because the domestic nature wastewater may not practically be able to be separated from the trade waste discharges. Likewise, it may be difficult to clearly define office premises in order to exclude them from the definition of trade waste. However, staff would support an addition to the explanatory note to help address this submitter's concern."*<sup>1</sup>
12. Accordingly, the Council Officer has recommended the following:

*"Change to explanatory note on the definition of trade waste to address submitter's concerns:  
"Explanatory note: The definition of trade waste is not intended to capture the discharge of ~~wastewater~~ from office premises or trade premise discharging wastewater unrelated to a trade waste activity."*
13. This recommendation is fully supported as it gives effect to relief sought in the submission as requested by (a) and (b) above.

<sup>1</sup> Page 138 of Bylaw Hearings Panel Agenda

**Further relief still sought**

14. However, for increased effectiveness and efficiency, WWB still seeks an exemption to be added to the definition, as sought by the original submission (Refer **Attachment 1**) as follows:

***"Exemption: Stormwater discharges are only captured where they are not already consented under other regulatory mechanisms."***

15. The exemption above provides certainty in respect to the Council Officers acknowledgement that *"the domestic nature wastewater may not practically be able to be separated from the trade waste discharges"*<sup>2</sup>

**Summary and conclusion**

16. The relief proposed WWB has largely been addressed by the Officers Recommendations, and therefore WWB fully supports the adoption of the recommended wording to the explanatory note for the definition of 'Trade Waste'.

17. Therefore, WWB requests that the Hearings Panel grant both the recommended change to the definition by the Council officer and the original relief sought by WWB in respect to inserting the 'Exemption' clause as outline in paragraph 14. Above and within the original submission.

18. Finally, and on behalf of WWB, RMG would like to formally record its appreciation to David Corlett, the CCC Democratic Services Advisor, for their assistance.

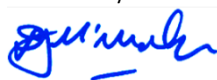
**Prepared by:**  
**Resource Management Group Ltd.**



Prepared by:

**Jacqui Hewson**  
Senior Consultant

Reviewed by:



**David McMahon**  
Director / Practice Manager

10 March 2025

**Attachments**

Attachment 1: WWB submission

<sup>2</sup> Page 138 of Bylaw Hearings Panel Agenda

## ATTACHEMENT 1: WWB ORIGINAL SUBMISSION

### Submission on publicly notified DRAFT TRADE WASTE BYLAW 2025

*Section 155 of the Local Government Act 2002*

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To Christchurch City Council

Name of submitter: **Winstone Wallboards Limited (WWB)**

- 1 This is a submission on the Draft Trade Waste Bylaw 2025 (**DTWB**)
- 2 **WWB** could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of **DTWB** that WWB's submission relates to and the reasons for WWB's submission are set out in **Appendix A and B** below.
- 4 WWB's submission seeks to:
  - 14 **amend the explanatory note** to the DTWB to ensure that non-trade wastewater, such as the water from the toilets, showers and kitchens of the non-trade activities on their Trade Premises site are not captured by the above definition of 'Trade waste', resulting in the requirement to obtain a Trade waste discharge consent.
  - 15 **Insert an exemption** to the definition of 'Trade waste' for stormwater discharges that have already been captured by other regulatory mechanism, such as regional council discharge consents. This would eliminate unnecessary duplication of consenting, both in terms of costs, processing and monitoring.
- 5 The general and specific reasons for WWB's relief sought in **Appendix A**.
- 6 WWB seeks the following decision from the local authority:
  - a. Grant the relief as set out in **Appendix B**;
  - b. Grant any other similar and/or consequential relief that would deal with WWB's concerns set out in this submission.
- 7 WWB wishes to be heard in support of the submission.
- 8 If others make a similar submission, WWB will consider presenting a joint case with them at a hearing.

**Signed** for and on behalf of Winstone Wallboards Limited by its Resource Management Consultants and authorised agents Resource Management Group Ltd



Jacqui Hewson  
Senior Consultant  
3 December 2024

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## Appendix A

### INTRODUCTION

- 1 WWB welcomes the opportunity to submit on the Draft Trade Waste Bylaw 2025 (DTWB)
- 2 The submission is broadly organised as follows:
  - [Summary of WWB's submission](#)
  - [Statement of Interest and Background](#)
  - [Specific submission in relation to the regulatory context](#)
  - [Summary of relief sought](#)
  - [Conclusion](#)
  - [Detailed relief sought \(contained in Appendix B\)](#)

### SUMMARY

#### *Submission in Opposition to Draft Trade Waste Bylaw 2025*

- 3 WWB generally supports the Council and the overall purpose of the revised Trade Waste Bylaw to control and monitor trade waste discharges into the public wastewater network in order protect public health and the environment.
- 4 However, WWB's key concern is ensuring that the definition of 'Trade waste' and the associated 'Explanatory note' which has unintentional consequence in terms of the capturing non-trade waste from a Trade Premises is captured by the requirement for a Trade Waste Discharge Consent as currently worded.
- 5 WWB submits that further refinement is needed to the above definition and explanatory note to provide greater clarity and certainty for the requirement for a Trade Waste Discharge Consent.
- 6 Detail in support of this are provided below, along with contextual background.

### STATEMENT OF INTEREST AND BACKGROUND

- 7 Winstone Wallboards Limited (**WWB**) is the largest manufacturer and distributor of gypsum plasterboard, drywall systems, associated products and services in the country. **WWB** is New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services. WWB has multiple locations throughout New Zealand, including its operational manufacturing and distribution site at 19 Opawa Road, Hillsborough, *Christchurch*.
- 8 The GIB® plasterboard manufacturing process requires a significant volume of water to mix with plaster to form the board. All site manufacturing process waste and wash water is collected onsite, stored in large tanks, passed through a solids separation process and then blended with fresh water before being fed back into the manufacture of new GIB® Plasterboard.
- 9 As a result, all water onsite used within the trade production and process system is fully recycled and directed the back into the manufacturing process, with no resultant wastewater entering into the Council wastewater network that relates to the industrial process onsite.
- 10 Therefore, the only water that is discharged from the Opawa Road site into the Council's wastewater network, relates to water from the toilets, showers and kitchen facilities.

## GENERAL SUBMISSION

### Key aims of the submission

- 11 Given the housing crisis in New Zealand, the continued supply of building materials is of utmost relevance and importance to WWB as New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services.
- 12 The principal aim of this submission is therefore to ensure the continued efficient operation of WWB Christchurch sites and the subsequent continued supply of building materials to support residential intensification.
- 13 The relief sought in this submission will ensure that WWB can continue to operate in an efficient and effective manner and establish the most appropriate provisions to achieve that goal and assist the Council in implementing relevant direction from higher order statutory instruments – particularly the National Policy Statement on Urban Development 2020 (NPS-UD).
- 14 WWB also seeks amendments to the notified DTWB to better implement the requirements of section 155 (2) of the Local Government Act 2002.<sup>3</sup> These are detailed in [Appendix B](#).

## SPECIFIC SUBMISSION IN RELATION TO THE REGULATORY CONTEXT

### Definitions included in the Draft Trade Waste Bylaw 2025

- 12 The Council consultation webpage states that Trade waste is the commercial and industrial liquid waste that is disposed of through the Christchurch City Council wastewater network. It also states that *“Trade waste does not include wastewater from toilets or bathrooms.”*<sup>4</sup>
13. Whilst the intention of the DTWB may be to exclude wastewater from toilets of bathrooms, this is not reflected anywhere in the Draft Bylaw as it is currently drafted. Wastewater from toilets, bathroom or kitchens etc, or any non-trade related discharges from what is defined as a ‘Trade Premises’ is not explicitly exempt from the definition of ‘Trade waste’.
14. The DTWB provides the following definitions:

#### **Trade premises means:**

- (a) any premises used or intended to be used for any industrial or trade purpose; or
- (b) any premises used or intended to be used for the storage, transfer, treatment, or disposal of waste materials or for other waste management purposes, or used for composting organic materials; or
- (c) any other premises from which a contaminant is discharged in connection with any industrial or trade process;
- (d) any other premises discharging other than domestic wastewater to the wastewater network; and includes any land or premises wholly or mainly used for agricultural or horticultural purposes.

#### **Trade waste means:**

- (a) any liquid or gas, with or without matter in suspension or solution, that is or may be discharged from a trade premises to the Council's wastewater network in the course of any trade or industrial process or operation, or in the course of any activity or operation of a like nature; and

<sup>3</sup> Procedure for making bylaws, Section 155, clause (2) (a) is the most appropriate form of bylaw

<sup>4</sup> <https://letstalk.ccc.govt.nz/tradewaste>

- (b) includes tankered waste, condensing or cooling waters, water from dewatering activities, stormwater, and domestic wastewater which cannot be practically separated.

*Explanatory note: The definition of trade waste is not intended to capture the discharge of wastewater from office premises.*

15. WWB's Opawa Road site is an industrially zone site, which contains a manufacturing facility for plasterboard, but also contains a number of office buildings used for administrative purposes. However, it is captured by the definition of 'Trade premises' under "(a) any premises used or intended to be used for any industrial or trade purpose". WWB accepts that the site is a 'Trade premises' by the definition.
16. However, this has implications for the definition of 'Trade waste' as the definition states that "any liquid or gas, with or without matter in suspension or solution, that is or may be discharged from a trade premises to the Council's wastewater network in the course of any trade or industrial process or operation, or in the course of any activity or operation of a like nature; and [emphasis added]
17. As currently worded, particularly the emphasised text, the definition captures any discharge 'in the course any trade or industrial process or operation'. There is no definition of what a 'trade operation' is and if it excludes administrative/office activities within the premises and the wastewater discharges that are associated with 'non-trade or non-industrial' activities on a trade premises.
18. The definition for '**Domestic wastewater**'
- "means wastewater (with or without matter in solution or suspension therein) discharged from premises used solely for residential purposes"*
19. This definition cannot be utilised in WWB circumstances to exclude wastewater from toilets, bathrooms and kitchen on their site as this definition only relates to wastewater discharged from premises solely for residential purposes. WWB considers that this definition could also be expanded to capture wastewater discharges that are 'domestic in nature' which could also cover discharges from 'office premises' or 'staff facilities'.
20. Therefore, WWB request that Council should consider expanding/broadening the definition of 'Domestic wastewater' to also include office premises. If Council adopted a broader definition of 'Domestic wastewater' then a simple exemption could be provided to the 'trade waste' definition that excludes wastewater from bathrooms, showers and kitchens.
21. WWB considers that amending the Bylaw for the reasons set out above would better implement the requirements of Section 155, clause (2)(a) in that the changes provide the most appropriate form of the bylaw.

#### SUMMARY OF RELIEF SOUGHT

22. In summary, with respect to the definitions of:
- '**Trade waste**'
23. WWB seeks to amend the explanatory note to ensure the non-trade wastewater, such as the water from the toilets, showers and kitchens of the non-trade activities on their Trade Premises site are not captured by the above definition of 'Trade waste', resulting in the requirement to obtain a Trade waste discharge consent.
24. WWB also seeks an exemption be inserted to the definition of 'Trade waste' for stormwater discharges that have already been captured by other regulatory mechanism, such as regional

council discharge consents. This would eliminate unnecessary duplication of consenting, both in terms of costs, processing and monitoring.

#### Conclusion

25. For reasons set out in this submission, WWB considers amendments to DTWB are required to ensure better align overall intention of the Bylaw to efficiently and effectively control and monitor trade waste discharges in order protect public health and the environment.
26. WWB currently recycles all of it trade wastewater on-site and feeds this water back into the production cycle so that the only wastewater discharge that occurs from the site comes from the toilets, showers and kitchens, which are domestic in nature of the wastewater that is discharged.
27. As currently drafted, the DTWB may unduly capture WWB this wastewater to obtain a discharge consent and would be an untended consequence of the currently drafted definitions.
28. WWB preference is to amend the DTWB to ensure the intended outcomes of the Bylaw are clarified through the relief of changes sought in **Appendix B** but would support alternative wording recommended by the Council provided it results in the desired outcome that WWB relief is seeking.

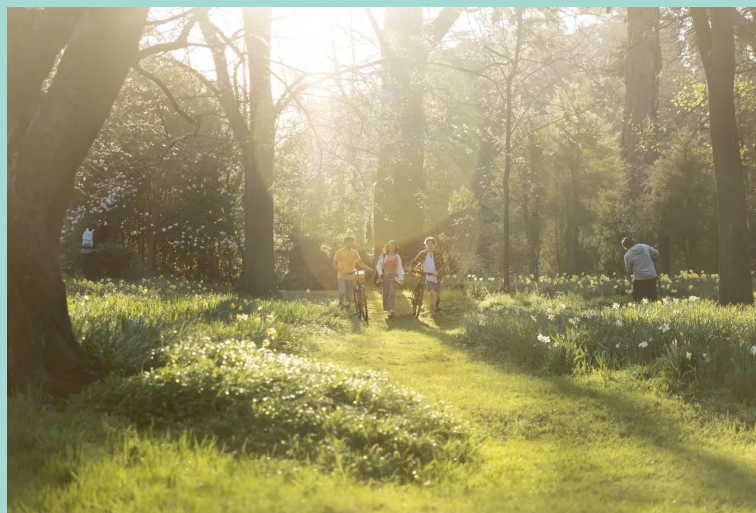
## APPENDIX B

### Draft Trade Waste Bylaw 2025 – Detailed Relief

Submitter Name: **Winstone Wallboards Ltd**

Part	Specific matter	Position	Reason for submission	Decisions requested / relief sought
5. Interpretation	Definition of 'Trade Waste'	Oppose	<p>WWB considers that that the definition unduly captures non-trade wastewater as 'Trade waste' and should explicitly exclude wastewater from a trade premises.</p> <p>WWB also considers that stormwater should be explicitly exempt where</p>	<p>WWB seeks for the definition be <b>amended</b> as follows:</p> <p>(a) <i>any liquid or gas, with or without matter in suspension or solution, that is or may be discharged from a trade premises to the Council's wastewater network in the course of any trade or industrial process or operation, or in the course of any activity or operation of a like nature; and</i></p> <p>(b) <i>includes tankered waste, condensing or cooling waters, water from dewatering activities, stormwater, and domestic wastewater which cannot be practically separated.</i></p> <p><i>Explanatory note: The definition of trade waste <del>is</del> <u>does not-intended to</u> capture the discharge of wastewater from office premises <del>—or-non-trade activity discharges of wastewater from a trade premises, such as wastewater from toilets, showers or kitchens.</del></i></p> <p><u><b>Exemption:</b> Stormwater discharges are only captured where they are not already consented under other regulatory mechanisms.</u></p>

# Review of the Parks and Reserves Bylaw 2016





## What this presentation covers

- Purpose of the bylaw
- Legislation the bylaw is made under
- Review process
- Parks and Reserves network
- What the bylaw covers
- Examples of the bylaw in action
- Changes that went to consultation
- Consultation process
- What we heard
- Summary



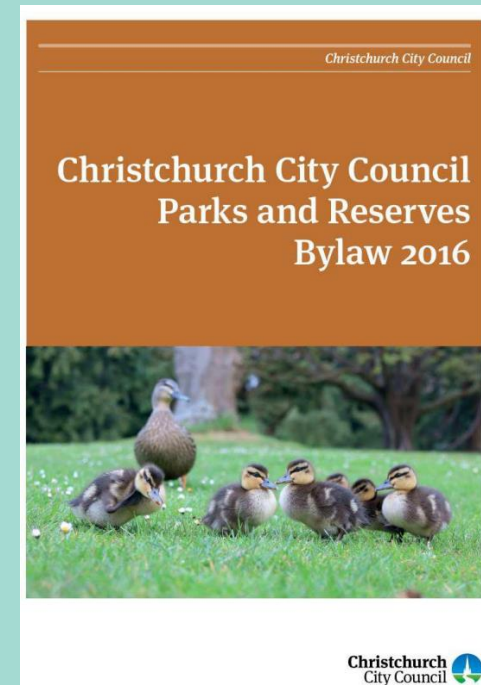
## Context and Review Process





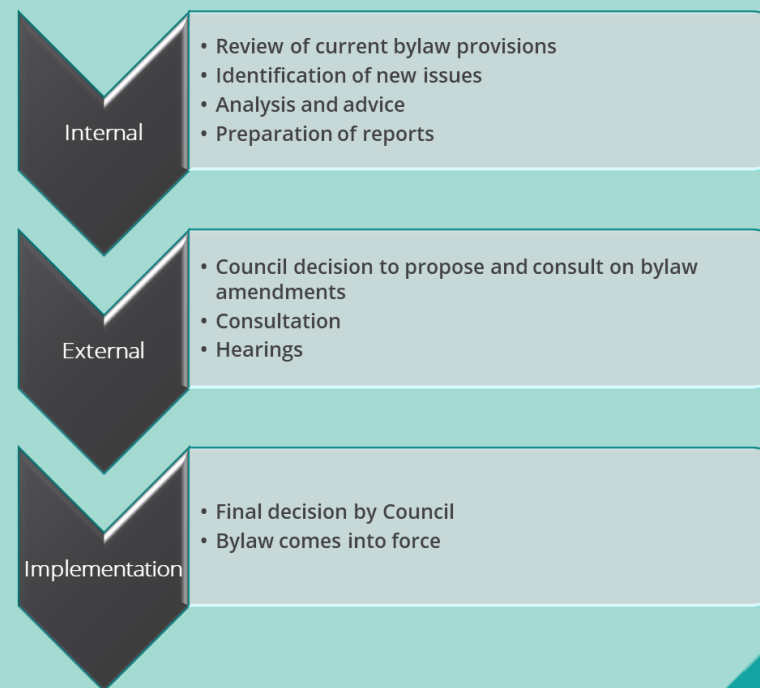
## Parks and Reserves Bylaw 2016

- Purpose:
  - manage, regulate and protect the parks and reserves network from misuse or damage
  - protect the public from nuisance and maintain public health and safety
- Made under Legislation:
  - Local Government Act 2002
  - Reserves Act 1977
  - Review is required under legislation (10 Year).



## Process

- Early 2024 - Staff begun cross council work.
- June 2024 – All Community Board Information session with offer for follow up sessions.
- October 2024 – Council approval to go to consultation with suggested bylaw changes.
- December – Consultation closed 15 December.
- March – Hearings Panel to consider feedback.
- June/July – Expected date Council will consider Hearing Panel recommendations on the bylaw.



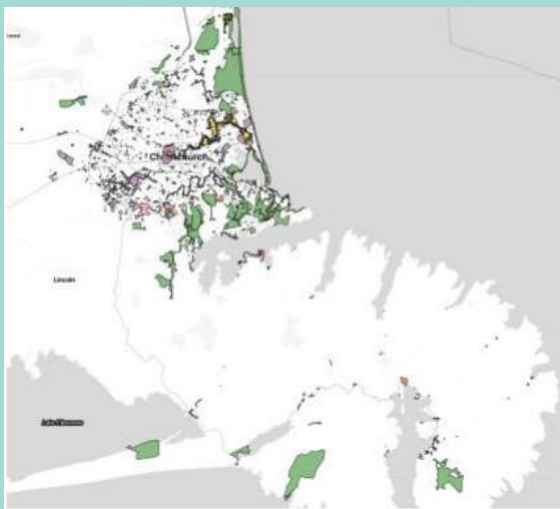
## What do we mean by Parks and Reserves?

- Parks and Reserves:
  - a) means any land which is vested in or administered by the Council under the provisions of the Reserves Act 1977; or
  - b) any park , domain, foreshore or greenspace area under control or ownership of the Council; but
  - c) does not include any such land, park, domain, foreshore or greenspace area which is subject to a lease that has been granted by the Council under the Local Government Act 2002 or the Reserves Act 1977



## What this looks like?

Neighbourhood Parks	797
Utility Parks	171
Sports Parks	115
Regional Parks	108
Garden and Heritage Parks	62
Residential Red Zone-Flatland	34
Cemeteries	23
Plant Nursery	1
<b>Total</b>	<b>1311</b>



2024 Parks & Foreshore Asset Management Plan

7

## What the Bylaw covers?

- Access
- Behaviour
- Animals
- Vehicles
- Fires
- Camping
- Aircraft
- Sports and other organised events
- Special areas





## Examples of the bylaw in action

- Visitors removing plants or flowers from Hagley park.  
6.1a – Interference with Reserves
- Helicopter taking off or landing in a park or reserve without permission.  
13.1 – Aircraft
- Member of the public entering a park that is closed for repairs.  
5.3 – Access
- Member of the public lighting a fire in a reserve without permission  
10.1 – Fires



## Review findings – Section 155 Report

In October a section 155 report went to Council as part of seeking approval to consult.

- Current bylaw is working well and largely fit for purpose.
- Proposed changes to address emerging issues, changes in technology and updated legislation.
- Purpose of proposed amendments:
  - clarify the intent of the bylaw
  - update bylaw to reflect how parks and reserves are used
  - align with best practice
  - ensure it is up to date



# Consultation



## Examples of changes that went to consultation

- Wider Bylaw: Terminology across the bylaw.
- Introduction: Updated legislation statement to refer to enabling provisions, amended and new definitions.
- Amended clauses: Changes to reflect new and emerging issues (eg change to clause 8.2 to reflect uptake of electric bicycles and scooters since the bylaw was last reviewed).
- New explanatory notes: New explanatory notes to clarify changes in legislation and responsibilities (eg formation of FENZ and fire management or useful resources like drone information).



## Consultation – What we did?

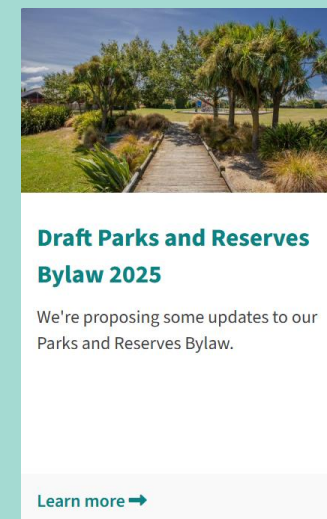
- Formal consultation started on 11 November 2024 and closed on 15 December 2024.
- Direct emails were sent to mana whenua and to 679 stakeholders.
- The consultation package contained multiple documents.
- Was advertised via Public notice in the Press, Newsline articles, hardcopies in Libraries and service centres and the Councils Kōrero mai | Let's Talk webpage.





## Consultation – What we heard?

- Sixteen submissions were received. Six submitters indicated they would like to be heard.
- Submitters comprised eleven organisations (including the six Community Boards) and five individual submitters.
- Submitters expressed a broad level of support for the bylaw and the proposed changes.
- Across the submissions no clear theme or repeated call for change was identified.
- Some comments included matters outside the scope of the bylaw or related to individual parks operational matters.
- The Kōrero mai | Let's Talk page had 865 views throughout the consultation period.



## Consultation – Some changes recommended

- The attached marked up bylaw shows all the working that has taken place during the review.
- Following consultation some suggested changes for panel consideration include:
  - Amended definition
  - New clause inclusions
  - New explanatory notes
  - Amended terminology
  - Amended explanatory note style

*Note: This version of the bylaw changes following public consultation in 2024. Blue background indicates where changes have been made from the 2016 bylaw and were consulted on. For detail on the changes, see the clause-by-clause analysis document in the 16 October Council report. Grey background indicates information to be updated once the bylaw is adopted. Yellow background are clause number updates. Green changes are changes recommended following public consultation.*

### Proposed changes to Parks and Reserves Bylaw 2016 2025

Pursuant to the Local Government Act 2002 and the Reserves Act 1977 the Christchurch City Council makes this Bylaw.

The Christchurch City Council makes this bylaw under section 106 of the Reserves Act 1977 and sections 145 and 146 (b)(vi) of the Local Government Act 2002.

#### 1. Short title and commencement

- (1) This bylaw is the Christchurch City Council Parks and Reserves Bylaw 2016 2025.
- (2) This bylaw comes into force on [date].

#### 2. Purpose

The purpose of this Bylaw is to provide for the orderly management and control of parks and reserves vested in, administered by or under the control of the Council for the benefit and enjoyment of all users of those parks and reserves.

#### 3. Interpretation

- (1) In this bylaw, unless the context otherwise requires:

## Summary

- Staff have been working on this review since mid 2024.
- Parks staff and Council Rangers report that the bylaw is an effective tool that is largely working well.
- The draft bylaw was consulted on in late 2024.
- Consultation was largely supportive.





Questions?



A banner image for Styx Living Laboratory Trust. It features a blue sky with white clouds and the tops of green trees at the bottom.

# Styx Living Laboratory Trust

## Styx Vision 2000 – 2040 (CCC)

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## General Comments







# Spokes Canterbury

## Parks and Reserve Bylaw hearing

March 2025

Stephen Wood,  
Co- chair standing in for Spokes Submissions Coordinator

# On roadways the rules are

- No cycling on standard footpaths, except small bikes, mobility devices and for deliveries.
- If a footpath is designated as a shared path then it can be cycled on. It's a way to provide a separated cycle facility, but there's a need to respect pedestrians. There may also be several driveway crossings.
- If a footpath looks very wide – many assume it's a shared path even if there are no signs. The width reduces conflict from driveways and pedestrians.



## For Parks and Reserves

- It's been uncertain whether cycling is allowed on all formed paths on parks and reserves, especially the narrower ones.
- Paths through reserves are an important part of our cycle network, Hagley Park, Riccarton Bush, Linwood Park, etc. It's clear when it's signposted and engineered as a cycle route
- Spokes welcomes the clarification in the new bylaw that makes it clear the cycles are allowed to use all paths or tracks. Thank you.





## For Parks and Reserves (continued)

- Good clarification on cycle parking. Thanks. Avoid blocking of paths.
- There's still a need to promote courteous behavior with pedestrians, and other users. clause 6.1(a &b)
- Interactions with dogs and dog owners managed with clause 7.1 (a) "effective control" and Dog Control Bylaws.
- What is the status of the public path through Rawhiti Domain through the golf course? Does clause 16.1 prevent its use?



# ŌPĀWAHO HEATHCOTE RIVER NETWORK



Quentin Mcdonald  
Wednesday  
12 March 2025

# Who is the OHRN

The Ōpāwaho Heathcote River Network (OHRN) is a community-based catchment group.

**The OHRN is a community voice for the river.**

We advocate for and promote the regeneration of the health and mauri of the river.

# Reserves & volunteers

- Many community groups working in reserves
- Increase in negative behaviour and attitudes by public
- Support for volunteer efforts is vital
- Community Partnership Rangers need & deserve support



## Parks & Reserves By-Law

**Generally support the proposed updating & changes**

- **Theft of bronze artwork & plaques - important to include “plaque, artwork, sculpture”**
- **Loss of information that is often otherwise not easily traced/known**
- **Campaign to prevent is required**



# Parks & Reserves By-Law

**Generally support the proposed updating & changes**

- **Casual weeding & removal of pest plants ought to be specifically allowed for**



# Parks & Reserves By-Law

**Generally support the proposed updating & changes**

- **Creation of cycle track or jumps needs specific inclusion**



# Parks & Reserves By-Law

**Generally support the proposed updating & changes**

- **Use correct name: Te Ihutai  
Avon Heathcote Estuary**





# ŌPĀWAHO HEATHCOTE RIVER NETWORK



Thank you for the opportunity to  
advocate on behalf of the river.



Submission 31128  
Anne Dingwall.  
Parks & Reserves Bylaw Hearings Panel.

DRAFT PARKS AND RESERVES BYLAW HEARING 12 MARCH 2025

Oral submission  
ANNE DINGWALL 31128

I address the following clauses in the proposed **Parks and Reserves Bylaw** in respect of Hagley Park, comprising North, South and Little Hagley Park. In the case of some clauses, I have no comment following further consideration, but have now included some other clauses with comment.:

**6. Behaviour in Parks and Reserves**

(1) No person in a park or reserve may —

...  
(b) drive or ride a vehicle within any park or reserve area where vehicles are allowed in a manner, which having regard to all the circumstances of the case, is or might be dangerous to the public or to any person.

The bylaw makes provision for electric scooters by amending the definition of **Vehicle** to include electric scooters and by including electric scooters in **Clause 8. 2 Vehicles, Vessels and Mechanical devices**.

Hired electric scooters dominate the range of electric vehicles permitted in Hagley Park, with the exception of Little Hagley Park. Whether commuting or hooning around on shared paths or unsealed tracks, many riders on hired e-scooters travel at speeds in a manner, which having regard to all the circumstances of the case, is or might be dangerous to the public or to any person. The wording 'or animal permitted' could be inserted after any person, to apply to a dog, leashed or unleashed.

It is evident that hired e-scooters either do not have speed limiters or the limiters allow excessive speeding in Hagley Park. I look to the Council for advice and action in this regard, given the Council's approval of e-scooters for hire and use in Hagley Park.

**Section 7 – Amend 7.1 to clarify how the dog control bylaw applies in parks and reserves.**

**7. Animals**

(1) No person may bring any animal into a park or reserve or allow any animal in his or her custody, charge or control to be within a park or reserve, unless —  
(a) It is a dog under effective control (subject to any restrictions or prohibitions

*under the Dog Control Bylaw); or*  
*(b) a Council bylaw has allowed the animal in the park or reserve such as*  
*through a dog control bylaw and the related dog control policy; or*

(a) is a new insertion in *Clause 7*.

In respect of Hagley Park, which comprises North, South and Little Hagley Park, I am concerned that these subclauses read together could be confusing for persons taking a dog into Hagley Park. Given that the stated purpose of the amendment is ***to clarify how the dog control bylaw applies in parks and reserves***, I recommend that the wording *with the exception of a dog* be inserted into (b), so it is clear that (a) pertains to a dog and *any restrictions or prohibitions under the Dog Control Bylaw* and (b) pertains to any animal other than a dog.

#### **10. Camping**

In respect of Hagley Park, I have no comment.

### **Section 12 – Include updated terms for lightweight drones or Remotely Piloted Aircraft Systems in clauses 12.3 and 12.4.**

#### **12. Aircraft**

Under *Interpretation*, the definition of *Aircraft* includes *helicopters*. Clause 12(4) has been amended to include ***lightweight drones or Remotely Piloted Aircraft Systems***. I recommend the insertion also of the wording *or helicopters*, so Clause 12(4) would read:

*The Council may by resolution determine any park or reserve where helicopters or model aircraft which are radio controlled and either battery or electric-powered lightweight drones or Remotely Piloted Aircraft Systems may not be flown.*

This would be consistent with the ***Explanatory Note***, which states:....*The general intent of this clause is to address noise and nuisance issues...*

The statutory 2007 Hagley Park Management Plan does not provide for or anticipate helicopters being flown and landing in Hagley Park for non-hospital-related commercial activities. Yet, in recent years, helicopters have transported patrons to the annual polo event in North Hagley Park or from North Hagley Park to the Riccarton Racecourse.

### **13. Sporting and other organised events**

In respect of Hagley Park, I have no comment.

### **14. Hagley Park**

*A plan of Hagley Park is contained in Schedule 1.*

*(1) To avoid any doubt, nothing in this Bylaw limits the application of the Christchurch City Council (Reserves) Empowering Act 1971.*

I recommend that the wording of 2007 Hagley Park Management Plan be inserted after Christchurch City Council (Reserves) Empowering Act 1971. The Council's Hagley Park Management Plan is a statutory plan under the Reserves Act 1977.

Whilst the definition of Park or Reserve, under Interpretation, states that it does not include any such...greenspace area which is subject to a lease that has been granted by the Council under...the Reserves Act 1977, nevertheless, the plan of Hagley Park... contained in Schedule 1. stating Parks and Reserves Bylaw Boundaries - Hagley Park, includes the leased greenspace area of the Hagley Park Golf Club in North Hagley Park.

When commercial or Council events are held in North Hagley Park, people frequently traverse the golf course during the hours of play to reach the event area.

In the interests of public safety and to address any nuisance issues, I recommend that following discussion with the Hagley Park Golf Club, the Council consider the inclusion, in Clause 14. Hagley Park of wording similar to that in Clause 16. Rawhiti Golf Course but applicable to the Hagley Park Golf Course in North Hagley Park.

Clause 16. Rawhiti Golf Course states:

*(1) No person may walk across or remain on any part of the Rawhiti Golf Course unless that person is engaged in a game of golf or is accompanying a person playing golf, or unless they are on a designated public walkway through the golf course.*

*(2) Clause 16.1 does not apply if the Council has waived this clause, in the public interest, for the purposes of a tournament, competition, or any other occasion.*

**Section 19 – New section to cover Offence and Penalty. This states that anyone who breaches this bylaw commits an offence under the Local Government Act 2002 and/or Reserves Act 1977 and is liable to a penalty as set out in those Acts.**

I support the inclusion of this new section, particularly as it would be applicable to *Clause 5.(1)(ii) sign* and therefore the damaging of dog control signs in North, South and Little Hagley Park, e.g. the defaced, now incoherent dog control sign in North Hagley Park indicating *Mona Vale* and *Hagley Park Golf Club*, near the bridge to the Botanic Gardens Kiosk,

***Section 20 – New clause 20.5 setting out clearly that any permission given under this bylaw may be reviewed and revoked at any time.***

Similarly, I support the inclusion of this new clause. Revocation of permission may be required for consistency with the statutory *2007 Hagley Park Management Plan*.

# Have Your Say – Let's Talk



Without the prior written permission of an Authorised Officer, no person may in a park or reserve —

(b) erect, construct, make, bolt, fix or place any structure, path or track, climbing aid, recreational or play equipment, or sign, except when Christchurch City Council or other governing body has a current consultation that includes this park or reserve. Only during the consultation period members of the public may erect signs or place signs or leaflet boxes on structures without damaging them.

# Ernle Clark Reserve









9  
May  
2023







19  
May  
3023





I request Christchurch City Council add part (c) to Section 6 of these bylaws as:  
(c) drive or ride a vehicle within any park or reserve on the grass, natural areas or planted areas. They must only use paths.

Many Parks and Reserves have Management Plans which also contain specific conditions (bylaws?) for that/those particular reserves. At present there does not appear to be a listing available to the public of all the Management Plans for specific, or grouping, of Parks and Reserves. The Parks and Reserves Bylaw 2025 would be a better document if all these Management Plans were listed in this document. Add links as an option too. I searched online for a Management Plan for a particular reserve without finding it. Finally, I put in a FOI request and it was provided to me.

I request Christchurch City Council add to these bylaws a list of all Management Plans that exist for reserves or groups of reserves. including the date they were adopted/updated. If possible, electronic links to them and where hard copies can be read/obtained be included.