

Submission on WCC Application to GWRC for SLEPO Resource Consent

Notes and Guidelines for OB Residents' individual submissions

WCC have recently applied to Greater Wellington Regional Council (GWRC) for a resource consent to extend the Southern Landfill – following the council's agreement of the business case for the 'Piggyback option' whereby the new fill is placed over the old Stage 2 part of the current landfill. They are inviting public submissions on the RC application, due 19th October. If you live in Happy Valley you will have received a letter about it.

I'm on the council's SLEPO (Southern Landfill Piggyback Option) working group representing OBRA. Other reps are Martin Payne of Friends of Owhiro Stream (FOOS) and also Carl Savage from the Brooklyn RA and Geordie Gartrell from Zealandia.

Making a submission is complicated by the fact that the extension is covered by both this GWRC resource consent but also a non-notifiable (ie. no public input) Outline Plan which has last week been agreed by the WCC itself (!) There are independent (WCC believes) commissioners currently being assembled to decide on the RC application.

The GWRC resource consent covers the water quality, geology, archaeology, air quality. However, it is the Outline Plan which covers terrestrial ecology, pest management and any offsetting of environmental damage. Neither are concerned with the existing or legacy landfills and any problems already associated with the landfill site.

This means a lot of our issues are not directly relevant and we have to somehow link them in to this resource consent.

OBRA will make a submission, but if you want to submit individually, the GWRC link is at:

<https://haveyoursay.gw.govt.nz/southern-landfill-extension>

Unlike WCC, it doesn't lead you through questions – you have to structure your own points and maybe attach a document.

Here are some notes I have made, but please contact me if you want to discuss or give me some input on the OBRA submission:

On the whole we think the SLEPO is acceptable as a solution, and certainly a vast improvement on the 2013 proposal to fill up Carey's Gully. The resource consent has more rigorous conditions than for the previous landfills because standards for environmental effects are more stringent now. We have been able to discuss with the council officers and consultants, Tonkin and Taylor, the technical specs for construction and conditions attached as the application process has proceeded.

It is complicated by the fact that the Landfill Management Plan will not be written - or existing one added to - for another couple of years and that this will contain all the day-to-day operational stuff - and certain things will need to be covered in the LMP. I think a possibility, if you want an operational issue addressed, is for one of the RC conditions to say that the issue must be addressed in the LMP.

Our concerns are :

- a. There should be a more **holistic view** of the Landfill including its legacy effects. This RC is treating the SLEPO as a stand-alone construction that will have a minimal additional impact. It does not do enough to ensure the whole site is maintained/improved, nor address the traffic, pest and litter problems.

b. It should be embedded in the Waste Management and Minimisation Plan (WMMP) and the WCC Zero Waste strategy because the SL and the future of waste in Wellington city are very much interlinked. For instance there is a statement that “estimates show that approximately 34,000 tonnes of residual waste will be generated by Wellington City in 2036” What is this based on? there could be a few different waste scenarios - how much and what types of waste are expected in the future – and how these will affect the landfill. Owhiro Bay community should not be expected to live with a major Class 1 Landfill for longer than absolutely necessary; if the Waste Strategy is followed the amount of residual waste will be minimised and can eventually be disposed of in an out-of-town regional facility.

c. Related to b, There is nothing to try and reduce waste such as **redesigning the drop off areas** or increasing the **redirection of waste** at the gate. This is interlinked with bylaws but it is within SL's powers to turn away anything under the Waste Acceptance controls criteria, eg. uncovered loads or hazardous waste, so **food scraps** and re-usable C&D for example could also be refused and it really comes down to enough manpower and will, and slotting it into WMMP actions.

d. **Construction and Demolition Waste** needs to be assessed. The private Landfill C&D has closed and this means that more C&D waste is coming to the Southern Landfill, but the council does not know by how much. This will affect volumes and needs to be measured and monitored and as per the WMMP, redirected.

e. The WMMP and WCC Action plan do not specify how the Landfill will be involved in **reducing the landfilled waste**. This is a gap. It needs to be specified at the SL level and I think it should go in the Landfill Management Plan. There should be a condition that says the Landfill Management Plan must include 1) Design Changes at the landfill can be made to direct cars and trucks to drop off recycling and organics and reusable things before being directed to residual landfill. It should be much easier. Combined with this, 2) staff at the gate should turn away trucks and cars with unacceptable waste.

f. The current **Community Liaison Group (CLG)** – which has a OB representative - is not very effective and there is a condition around the planned Community Advisory Group (CAG) which is all good, but a couple of other points would be that the CAG - as well as the council - must 1. be informed of any incidents; 2. have timely access to all docs; 3. have timely notification of minutes, agendas and meeting dates; 4. have a guarantee that a senior level WCC officer(s) will attend; 5. have input to decisions.

g. **Leachate and water quality**. OB is concerned with the quality of water in the Owhiro stream and do not feel it is enough to say that water quality will be no worse than at present. There needs to be better monitoring such that the source of any contamination can be identified. Currently the possible sources: C&D, T&T, the legacy landfills 1, 2 and 3 are all possible sources. When SLEPO is added we want to know that it will be certain which is the culprit.

A leachate risk in the long term seems to me to be from the way the offsetting of SLEPO damage has been planned. See point 2 below. I am going to work this into the OBRA submission.

h. The **windblown plastics** issue has not been dealt with. As well as the wider issue of the whole landfill site being plagued by flying plastic bags etc, there is nothing to trap rubbish before it gets into the new stormwater pipes and thus into the stream. (not a

part of the RC, but WCC had promised to do a 'Source Tracking' exercise to see where rubbish is coming from, but the Landfill Operations Manager left and the new Acting Landfill Manager is now looking into it.)

i. **Air Quality:** WCC do not seem to be sure, but it seems likely that the smells we get periodically are from the sewage sludge, when things go wrong. (Also the sludge is taken to the tip face every morning and mixed in there, so I'm surprised it's not a constant smell). When the sludge stops being piped here in 2026, hopefully there will be no more smells except occasionally when maintenance work is done at Moa Point. But you may want to add something.

j. One of the RC conditions should be that there is a WCC **emergency debris disposal plan**. The RC application specifies how damage to the Landfill will be managed but WCC has nothing in place to specify how debris in the city after an event will be dealt with. All we have currently is a regional guideline document which is very skimpy and with no detail. If an earthquake strikes, the landfill could fill up very quickly, and any future planning based on space for waste goes out the window.

Other related things not directly relevant in this submission but which I will try and hang off some points for the OBRA submission are:

1. We have stressed to the council on several occasions that we won't accept any further extensions to the SL. The councillors have officially stated their support for this, but to future proof it we could for example request a covenant (a legal agreement involving voluntary restriction(s) on property rights) for the upper area of Carey's Gully that needs protecting. We can pursue this through the District Plan.

2. GW are not interested in the **terrestrial ecological** effects, which are covered by the Outline Plan. Any earthworks legally require **mitigation, offsetting or compensation** and there are formulae to work out how much must be done, but GW is also not interested in that. However, this point is related to future leachate problems. We do not agree with WCC's rather novel idea of **offsetting** the environmental damage partly with native replanting on top of the closed Stage 3: instead of the standard cover for a closed landfill of 60cm topsoil, grassing over and mowing, they are planning to lay a thicker membrane, 2m of topsoil and then plant native trees, and monitor that for just 10 years.

They are assuming tree roots will not rupture the membrane, and this seems a risky assumption to say the least. a) cabbage tree *Cordyline Australis* which is *on the list to be planted* has a long tap root that may grow to a depth of several metres; b) other trees will accidentally get introduced, if not in 10 years, certainly in 100, 200, 300 years, which have very long tap roots (eg. more cabbage trees, gum and rata). This may rupture the membrane causing leakage of water into the old Stage 3 tip and leachate coming out into the stream.

We want them to reconsider this and spend the offset in more valuable ways such as weeding and revegetating and removing pests further up the gully where pests have degraded the vegetation. And the area is going to have to be maintained not for 10 years but in perpetuity, whether by mowing or weeding! (by the way, Martin Payne of FOOS had a great idea of putting a solar panel farm on it which would help power the tip operations).

WCC and their consultants are not keen on changing their offset idea, and it has already been agreed in the Outline Plan despite our objections; they maintain that because in the hierarchy, 'offsetting' comes above 'compensation' they are therefore obliged to do the offsetting by planting Stage 3. Extra revegetation and pest control would only be 'compensation'. My argument is that 'offsetting' with an exercise that is not only of less value than 'compensation' but also presents a real risk of leachate and pollution of the stream some decades down the line is an invalid position to take. Also that there is no reason that replanting the stage 3 cap and replanting a different but equally nearby area, should not both be defined as 'offsetting'.

3. Part of the offset is to trap pests over 30Ha. **Pest management** is also not of interest to GW. There is no Pest Management Plan or survey but this is included in the Terrestrial Ecology report in the Outline Plan. We don't know which 30Ha the 'compensation' area is and how it has been chosen. We think that the whole Landfill area should be intensively managed because of the increasing proximity and importance of Zealania's halo effect and Capital Kiwi a couple of valleys over. Vermin and mustelids are either imported with waste or attracted to the tip face. In view of the intensive trapping in which numerous local Wellingtonians are involved, it would be a slap in the face for nothing extra to be done in the Landfill site.