

Submission by Owhiro Bay Residents Association (OBRA): Southern Landfill Extension SLEPO

OBRA represents Owhiro Bay residents. We all live near the Southern Landfill and have a stake in its future, daily feeling its effects both direct and indirect. We have been represented for the last two years on the WCC SLEPO Working Group and have had constructive and useful discussions with Wellington City council officers.

Although we largely support the resource consent application we have the following issues.

1. SLEPO is not a stand-alone landfill

Firstly, a general point: This project is being treated as a stand-alone construction which has very little environmental impact in isolation. This means that the current and continuing effects from the landfill – water, land and air pollution, noise, traffic, pests - in absolute terms is not addressed by this resource consent. OBRA's view is that it is not good enough to ensure that things are not made any worse; there needs to be accountability for the whole site of 300Ha in terms of its environmental effects. This is more urgent than ever, with the increasing halo effect of Zealandia, Capital Kiwi 2 valleys away, and the expanding population of Happy Valley - the route for numerous trucks.

2. Integration with WMMP and the Zero Waste Strategy

A general point which informs the concerns below: Wellington has a Zero Waste Strategy; the WMMP and Action Plan supports this and sets out a framework for moving the city fast towards minimising waste. The Southern Landfill is a central part of this plan. It has been difficult to set down plans for the city's waste minimisation in isolation from the SL and, conversely, the way the whole SL site will be used post-SLEPO cannot be decided without reference to the WMMP.

We do not think that enough attention has been paid to the WMMP and the Zero Waste Strategy and the way in which SL must work towards minimising waste. Two ways of doing this would be:

1. Methods for **excluding organic and recyclable waste** at the gate should be included in the Landfill Management Plan under its two headings: *Types of waste to be accepted and those that are prohibited* and *Waste acceptance control and methodology of monitoring types of refuse accepted*. (See Conditions 31 and 54b).

2. We would also like to see the Landfill Management Plan contents (Condition 31) include an item, alternatively included under the Waste Acceptance conditions section of App.F, requiring the consideration of designing changes at the **landfill user interface** to direct cars and trucks to drop off recycling, organics and reusable things consecutively before being directed to residual landfill. It should be made much **easier for the public**, and there are many precedents in Europe. This is likely to significantly reduce the landfilled waste.

3. The Community Advisory Group

Community groups need full involvement in the running and evolution of the SL. Conditions 5-11 of App.F cover a new Community Advisory Group (CAG) which is a better representative body than the current Community Liaison Group (CLG). We agree with this but would like to see the following enhancements:

1. Condition 6a:

Amend to say “Facilitate ongoing engagement and long-term working relationships between the Consent Holder and the CAG, on behalf of the community, in respect of activities authorised by the SLEPO consent, and the management and monitoring of environmental effects **for the whole Southern Landfill site.**”

2. Condition 6 should include an additional point:

e. Input to operational matters that affect the community such as water contamination.

3. Condition 8. should be amended: “Meeting minutes shall be taken by the Consent Holder and distributed to the members of the CAG **with date and agenda for the next meeting within a period of two weeks.**”

4. Extra points:

- Members should agree the TORs for the CAG.
- CAG should be given access to all relevant documents

5. Condition 13e should be amended to “Notify Council **and the CAG** of the complaints within a timeframe as agreed with the Council, depending on the nature of the complaint.”

6. Condition 32a. should be amended to: “The SLEPO LMP appendix shall be subject to review annually by Council **and the CAG**, from the SLEPO commencement date (unless the requirement for review is waived by the Council **and CAG** in writing).”

7. Condition 32c. should be amended to: “Any amendment required by the Council arising out of this review shall be incorporated into the SLEPO LMP without delay and an updated copy of the LMP shall be provided to Council **and the CAG** for review.”

8. Condition 66b should be amended to: “Immediately notify the Council **and the CAG** of the escape of leachate or other pollutants.”

4. Mitigation/Offset/Compensation proposal

OBRA realise that this resource consent does not deal with SLEPO’s terrestrial ecological effects nor the mitigation, offsetting and compensation for environmental damage. However, this point is related to potential **leachate** problems caused by the offsetting exercise. We do not agree with WCC’s plan to offset 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 (although the aftercare plan may increase that to 30).

WCC are assuming tree roots will not rupture the membrane which would cause inflow of water to the closed Stage 3, and thus leaching of contaminated water out into the stormwater and stream. This is a risky assumption for the following reasons:

1. The Terrestrial Ecology Report states that “it is unusual for roots to penetrate to a depth greater than 2 m”. ‘Unusual’ is not good enough; the NZ cabbage tree *Cordyline Australis*, which is on the list to be planted on the cap, has a long tap root that may grow to a depth of several metres: A study has shown that “By age 25 years, root depths reached 1.75-2.00 m” (*Below-ground morphology of Cordyline australis (New Zealand cabbage tree) and its suitability for river bank stabilisation* in New Zealand Journal of Botany, 2005, Vol. 43: 851-864). Other trees will accidentally get introduced which have very long tap roots (eg. more cabbage trees, gum and rata), if not in 10 years, certainly in 100 years. It won’t be an easy exercise to remove these trees from a maturing bush.

2. The source cited in the Terrestrial Ecology Report report states that “The durability of buried barriers is also uncertain and those that do carry guarantees against degradation are for 20 to 30 years.”

3. There is no precedent that can be cited for this type of replanting.

How long will the bush-covered Stage 3 cap be monitored and weeded? It will need to be as long as we want to stop leachate getting into the Owhiro Stream.

OBRA requests that GW bears in mind this risk of pollution to the Owhiro Stream.

We consider that the Offset and Compensation should be allocated in more valuable ways such as weeding and revegetating and removing pests further up the gully where pests have degraded the vegetation. Grassing over the Stage 3 cap as part of the usual closure aftercare would be much easier to maintain and monitor than regenerated bush.

We request that one of the Conditions in App F is for a re-evaluation of the offset idea, with stringent requirements of proof that it will be a safe option, and the consideration of other options.

5. Emergency Debris Disposal Plan

We would like to see a resource consent condition that WCC will publish an 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 such as earthquake or tsunami will be dealt with. All we have currently is a regional guideline document which is very high-level with no detail. If an earthquake strikes, the **landfill could fill up** very quickly, and any future planning currently in existence, based on capacity for waste, will become irrelevant.

6. Water Quality of stream

OBRA is concerned with the quality of water in the Owhiro stream and do not feel it is enough to guarantee that water quality will be no worse than at present.

Two particular concerns are:

1. Litter blows off the landfill and lodges in the vegetation and Owhiro Stream's tributaries. This can end up on Owhiro Bay beach in the Taputeranga marine reserve. Residents periodically clear it up. There needs to be a filter on new SLEPO tunnels to trap flying plastic bags. We would also like to see more done to keep litter out, not just from SLEPO but from historical sources within the whole landfill area.
2. We would like effective monitoring of potential sources of water contamination such that it is possible to identify the culprit in any pollution event. There are two private landfills in the catchment as well as the current Southern Landfills 1, 2 and 3 and now SLEPO. Currently there is a lot of uncertainty when a pollution incident occurs which of these sources is the culprit.

7. Other changes to Conditions in Appendix F.

We request the following changes to the conditions:

1. Condition 31 lists what is expected to be addressed in the LMP. It should say - “Pest and weed control **including pest management of the 30Ha of compensation area.**”
2. We request a condition to say a **Pest Management Plan** will be written before construction commences. This should link in both the SLEPO compensation area and the wider pest control exercise over Careys gully currently being carried out by WCC biosecurity team.

3. Council has officially stated their intention that there will be no more extensions to the SL, but this needs to be future-proofed. We request that a condition be added to the RC that the possibility of a covenant is examined in the District Plan for the upper area of Carey's Gully that needs protecting.