



14 March 2019

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Environment Southland
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Ref: 6-VN095.00

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Dear Tayla

APP-20191112 – Southland District Council Braggs Bay Landfill – Further Information Response

Please refer the following and attached document for the response to your further information letter and following email (22nd and 25th February).

I have tried to merge your comments email with your questions so that they correspond to the points of your letter.

Question 1 and 2:

Providing separate volumes for the greenwaste and cleanfill waste is difficult. The total annual volume of 300m³ is relatively small and is based on previous years of landfill activity.

Separating these out further for the purpose of conditions of consents could result in unachievable conditions. The applicant's facility responds to vegetation clearance and building works on the Island which are undertaken by the public. The Council cannot accurately predict the composition of the waste and we consider the establishment and use of a generic volume appropriate for resource consent purposes. The current application does not seek an increase in the volume of waste discharged from the previous activity on the site.

A proportion of green waste generated is also subject to weather events on the Island. Limiting the volume of green waste which can be accepted (excluding total annual volume), could result in the inappropriate disposal of green waste elsewhere on the Island.

The applicant seeks resource consent for the discharge of a total of 300m³ of cleanfill and green waste and does not want to be restricted in terms of the proportion or mix of waste i.e. up to 300m³ of cleanfill or greenwaste could be discharged or any mix of the two wastes up to a total of 300m³ annually.

As noted in the application waste disposal options on the Island are limited. Continued use of an existing landfill facility will avoid the need to establish a new landfill elsewhere on Rakiura Stewart Island in the immediate future.

Question 3

As discussed in the application, the number of disposal events is a relatively low monthly figure. Capping the frequency of events by way of a condition could hinder the overall effectiveness of the landfill and the ability to accept suitable material on an as required basis.

As a maximum, it is expected that an average 5 separate disposal activities would occur at the site over each week. This would cover weeks after weather events where there is a greater demand for the public service being provided by the applicant and other weeks where there is little to no activity. For this reason, the applicant wants to avoid any conditions limiting the number of discharges per week and prefers use of an average.

Question 4

Please refer to the attached site plan.

As shown on the plan, the disposal area does not include the infilling of any wetland area and no wetland modification is proposed. Any area to be covered by way of this application has already been used for disposal activities under previous consents.

Public access is controlled across the whole site and at all times. The only entrance to the property is via the gate at Braggs Bay Road. Access is limited to the pathway through the storage area and disposal area.

No office and/or infrastructure is located at the site.

The area used for stockpiling is shown on the attached plan.

The unnamed watercourse and buffers distances are shown on the site plan.

Question 5, 6 and 7

As stated in the application, no other resource consents are required.

The proposal meets the permitted level conditions of Rule 12 of the Operative Water Plan and Rule 15 of the pSWLP. Storm water runoff will occur from an industrial/trade premises but does not contain hazardous substances and will have less than minor effects on water as detailed in the Land and Water Science report supplied as part of the application.

The proposal does not receive a waste volume equal to or greater than 100,000m³ per year and therefore is a permitted activity under Rule 5.5.3.11 of the Regional Air Plan.

The stockpiling of material at the site is permitted under the abovementioned Regional Air Plan rule. There are no rules within the Operative or Proposed Water plans relevant to the material stockpiled at the site.

Question 8

Environment Southland have stated that the practice of mixing cleanfill and greenwaste is no longer considered best practice. The applicant seeks to maintain this form of disposal for these two wastes as it is the most practical and efficient option present. As noted above and in the application waste disposal options on the Island are limited.

The assessment prepared by Land and Water Science supplied with the application demonstrates the actual and potential effects associated with the historic and future use of the site as a landfill on surface water and the local receiving environment is likely to be minor. This is based on the previous/current mitigation measures utilised at the site. Furthermore, the report notes that monitoring results suggests that the discharges from the site are reverting back towards signatures more consistent with a peat wetland ecosystem.

The report concludes that since 2009, there is little obvious impact on the local water quality from landfill discharges. Given these findings, which assessed the current mitigation measures

employed at the site, it is considered that the measures currently employed are suitable. However, as mentioned in the application, the recommendation by the report writers to employ a measure(s) to deal with contaminant release during periods of high-intensity rainfall has been acknowledged by the applicant.

The existing vegetation surrounding the disposal site is well established and has been largely unaltered since the development of the Council's greenwaste and cleanfill operation. The vegetation assists in the uptake of some nutrients which are released as part of the leachate. The applicant does not intend on removing any vegetation at the site, except where required to maintain access to the disposal area and wider site (e.g. removing plants which grow over tracks).

Further planting (dense native cover) or the use of a silt fence along the western extent of the disposal area would assist in limiting sediment run off which can carry excess nutrients.

Question 9

An assessment of this statement against relevant sections of the MoE's guidelines is provided below. The statement extracted from the application refers to the disposal and cover method. It is noted that the MoE's document was designed to provide guidance only.

Section 5.10 of the guidelines relates to landfill cover systems. A mixture of daily and intermediate cover is undertaken at the site. As the frequency of disposal activities at the site is very low in comparison to other landfills in the region, covering of the active site is undertaken as appropriate. Daily coverage to manage windblown litter, odour and vermin and birds is undertaken as required. It is in the interest of the applicant to maintain a tidy site.

Intermediate cover can only occur when sufficient material is deposited at the site. The mixing of material partly provides for this form of cover. Compaction of this area further deals with the abovementioned management issues as well as limiting water ingress by maintaining a compact form, the aesthetics of the site and as a means of mitigating contaminants from entering storm water.

The applicant intends on using the site for a time period extending past the duration of the resource consent currently being sought (acknowledging that further resource consents will be required to undertake this). Therefore, no final cover is proposed. The applicant considers it best to determine final cover once there is a better understanding of the final form of the site. It is also acknowledged that best practice for final cover may change from what is currently considered best practice, at the time when this is required.

Section 6.2 of the guidelines relates to waste acceptance criteria. The applicant maintains an "approved materials list" which aligns with Class 3 landfill materials. All loads are checked prior to disposal at the site and must be approved by Southland District Council staff. Those wishing to use the site must agree to the applicant's conditions of consent and requirements before utilising the site. The landfill maintains a strict greenwaste and cleanfill acceptance criteria. Waste identified as being outside of this spectrum or as being potentially hazardous is not accepted.

Section 6.4 of the guidelines relates to records, verification and monitoring. The Southland District Council staff member who operates the site on behalf of the applicant requires that any and all disposals at the site are recorded. All loads are inspected prior to being accepted. No members of the public are permitted at the site without supervision of Southland District Council staff. The records include the name of the public member, source, composition, volume, declaration and staff member's acceptance/refusal notes.

Section 7.8 relates to waste placement and compaction. Given the low frequency and volume of disposal activities at the site, the applicant has the ability to tailor the placement of waste and compaction to compliment the activity and receiving environment. The disposal area is set

in a way that minimises the size of the working face (already small because of abovementioned low frequency and volume). The compaction of the site allows for a smaller area being required for the disposal of waste. Compaction also fills voids mitigating the effects of vermin, water ingress and generation of excess leachate.

The applicant is open to discussing additional monitoring conditions (other than those already required by conditions of consent), as was acknowledged as part of the Land and Water Science assessment and in the application.

Alternatives for the disposal of material, as discussed in the application have be considered. Beyond the two options considered in the application (do nothing and new site), the composting/chipping of material has also been covered. Although these may be practical options for mainland landfill sites, they are not considered to be suitable in relation to this proposal on Rakiura Stewart Island.

Both composting and chipping creates a product which would need to be stored on the site and then disposed of elsewhere. The applicant notes that finding a market for this product on the Island would be unlikely. Being unable to move the product would result in stockpiles filling the site and/or need to dispose of the material off site. The applicant had previously looked at getting a chipper to the Island however the cost of this would be prohibitive.

Please get in touch if you wish to discuss this proposal further.

Regards

A handwritten signature in black ink that reads "Christie Robinson". The signature is written in a cursive, slightly slanted style.

Christie Robinson
Graduate Planner