Continuing earthquake waste processing and disposal activities at Burwood Resource Recovery Park and Burwood Landfill

Response to written comments

Following the recent consultation process, including the community information sessions at the Parklands Baptist Community Church on 17 and 18 November 2015, written comments were received from 86 persons. The issues raised broadly fell into the following categories:

1. Preference for permanent disposal at Site B rather than Site G;
2. Loss of recreational area and values;
3. Potential impacts on amenity (traffic, dust, odour, noise, visual);
4. Potential impacts on human health; and
5. Fire risk.

These issues, and the response of BRRP Ltd and the Christchurch City Council as resource consent applicants, are outlined below. A site map is included on the last page of this information for reference.

Issue 1: Preference for permanent disposal at Site B rather than Site G

Summary of written comments received

Site G was not favoured for permanent disposal due to its proximity to residential areas and because it will result in the loss of an area which is currently accessible by the public and used for passive recreation. Conversely, Site B was favoured because it is located further away from residential areas and is on a site which has already been substantially modified by the existing processing activities.

Response

BRRP Ltd and the Council acknowledge the concerns about Site G. Based on the feedback received both parties have subsequently made the commitment to pursue Site B for permanent disposal with the relevant authorities. Subject to obtaining all of the necessary authorisations for Site B, Site G would not proceed.

However, the authorisations required for Site B will require changes to the regional and district planning documents. This will require political support within the Canterbury Regional Council and the Christchurch City Council, and then approval by the Minister for Canterbury Earthquake Recovery under the Canterbury Earthquake Recovery Act 2011. Resource consents and a further consultation process will then likely be required. Finally, the underlying reserve status of Site B will likely need to be amended.

Due to the uncertainty of timing and outcome in obtaining the authorisations for Site B, resource consents for Site G will continue to be pursued at the current time. However, as above, BRRP Ltd and the Council will not develop Site G until an outcome for whether Site B can be used for permanent disposal is known. With approximately 10–12 months disposal capacity available in the Site A extension, there is sufficient time for Site B to be pursued before a further permanent disposal option is needed (i.e. Site B or G).

Issue 2: Loss of recreational area and values

Summary of written comments received

Concerns were raised that Site G would encroach into an existing publicly accessible area and consequently sever recreational access. Comments were also received that the landfill and recovery park operations, if extended to 2021, would further delay the ability to use the wider area for recreational purposes.

Response

Should Site G proceed, it will be constructed in a north to south direction commencing in late-2016 / early-2017. Its full extent will ultimately be determined by the volume of earthquake waste received. If less waste is received than anticipated, then Site G will be smaller and not extend as far south. In that regard the existing fence and trees will only be removed should the circumstances require.

Should Site G be required at its full capacity, then the existing recreational track access will be rerouted to the south. The waste cell does not extend as far south as the existing ponds near the southern boundary of the landfill zone, so these will be retained. All of Site G is within the area previously designated for landfill use.

Opportunities will be available to open up other areas of the landfill to public access and recreation over the next several years. BRRP Ltd and the Council have made the commitment to bring forward the landscaping programme and progressively rehabilitate the site. The landscape plan will continue to be developed with community input.

Issue 3: Amenity impacts (traffic, dust, odour, noise, visual)

Summary of written comments received

Various concerns were raised about the loss of amenity caused by the presence of the earthquake waste processing and disposal activities.

Response

In the initial period following the earthquakes the site operated 24 hours per day and generated a high number of truck movements. Following the granting of resource consents in 2012, BRRP Ltd and the Council implemented a range of mitigation measures to reduce amenity impacts, including:

- A new access road route from the landfill entrance to the weighbridge, to locate the road as far as possible from residential boundaries;
- Installation of 500 metres of acoustic bunding and fencing at the landfill entrance and along the new access route into the site;
- Control of traffic speeds on access roads;
- Cleaning and/or wetting of road surfaces to minimise dust generation; and
- Formation of a community liaison group as a forum to manage issues and concerns.

All mitigation from the 2012 consents will continue into the 2015 consents. In addition, BRRP Ltd and the Council have undertaken to:

- Reduce operating hours by 30 hours per week. The proposed hours will be 6am to 6pm Monday to Friday, 6am to 12pm on Saturday, and closed on Sunday and public holidays.
- Close Site P (the sludge pond operation) by September 2017, with any residual activity transferring to the Christchurch Wastewater Treatment Plant at Bromley. This operation has been a major source of truck movements to date.
- Plant trees near the southern boundary of the landfill site to provide, in the long-term (i.e. once the trees are established), a visual screen of the site from the residential areas.

Furthermore, it is expected that traffic volumes to the site will continue to naturally tail off as the recovery progresses. Currently, traffic volumes are approximately 33 per cent less than their peak in mid-2014.

Issue 4: Potential impacts on human health

Summary of written comments received

Concerns were raised about the type of material being disposed of and what impacts this may have on human health and the environment if those contaminants became airborne or entered groundwater or the coastal area.

Response

Only earthquake waste, sourced from demolition and repair activities, can be accepted at the recovery park for processing. Typically, this is building materials such as treated and untreated wood, insulation material, plasterboard, carpets, and electrical cable. Wastes which are not accepted include general domestic refuse, human waste, asbestos containing materials, and hazardous waste.

At the landfill, where disposal occurs, the wastes are the residual material from the recovery park processing, hardfill from the city's sewer, water and road network, and liquid waste from the city's infrastructure network. As with the recovery park, wastes which are not accepted include general domestic refuse, human waste, asbestos containing materials, and hazardous waste.

On the foregoing basis, the potential contaminants in question do not pose the same degree of risk to human health as might otherwise be anticipated with a regular landfilling operation. Overall, the risk to human health from earthquake waste is significantly less than that already present at the site due to the presence of the former municipal landfill, where the majority of Christchurch's refuse was disposed of in the period 1984–2005.

The existing landfill is subject to a comprehensive water quality monitoring programme, which has been expanded to include the monitoring of earthquake waste. The most recent results of this monitoring indicate that the site is operating to expectations. There are no potable water supplies affected by the landfill and recovery park operations.

BRRP Ltd also undertakes comprehensive monitoring of on-site conditions to protect the health of their own staff. No concerns have been raised by this monitoring to date.

Issue 5: Fire risk

Summary of written comments received

Following the fire in the wood stockpile in August 2015, concerns have been raised about the on-going risk of fire in other parts of the landfill and recovery park.

Response

BRRP Ltd has decided to immediately cease the storage of recovered timber on site. It was this material which caught fire recently.

Weekly soil cover will be introduced to any area where the residual waste stream from the recovery park is disposed of. This will limit the extent of oxygen able to penetrate into the waste and reduce the fire risk.

At the recovery park, the existing waste stockpile is regularly monitored with the use of thermal imaging equipment. No concerns have been identified to date. The key mitigation for reducing fire risk is to process and dispose of the waste as soon as practicable.

Summary of resource consents currently being applied for

1) Continue earthquake waste processing activities (at Site B) until 31 December 2020;

2) Extend the existing earthquake waste cell (at Site A) to provide for disposal capacity of up to 160,000 tonnes; close by 31 December 2020;

3) Develop a new earthquake waste cell (at Site G) to provide for disposal capacity of up to 540,000 tonnes; close by 31 December 2020;

4) Continue the temporary storage (until 31 December 2020) of sensitive demolition materials (at Site D) sourced from buildings where human lives were lost during the earthquake events;

5) Continue the infrastructure hardill and soil disposal (at Site F) until 31 December 2020; and

6) Rehabilitate and landscape all sites; complete by 31 December 2021.

Location of Burwood Resource Recovery Park and Burwood Landfill and activities

Legend

- Landfill Boundary
- Landfill Avenue - Site Access
- Site A *Existing Earthquake Waste Cell*
- Site A *New Site A Extension*
- Site B *Burwood Resource Recovery Park*
- Site D *Existing Sensitive Building Material Storage*
- Site F *Existing Infrastructure Hardfill Cell*
- Site G *New Earthquake Waste Cell*
- Site P *Existing Sludge Ponds*