

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Transwaste Canterbury Limited's application
to cancel/change condition 22 of consent
RC020069

SUBMISSION AND PRESENTATION

for

WAIPARA DISTRICT RESIDENTS ASSOCIATION

By

BENJAMIN PAUL KEPES – CHAIR

JUNE 20 2006

8. The WDRA submits that a number of significant areas, including; waste volumes, leachate volumes and concentrations, and sub surface hydro-geological factors⁶, were misrepresented during the initial consent process. As such it is the opinion of the WDRA that ALL resource consents relating to the landfill operation should be reheard under s294 of the Resource Management Act 1991.
9. The WDRA recognises that some councils who generate waste to the landfill have not complied with their own zero waste targets. We contend that this is a reason that waste levels have risen so sharply and we urge the commissioner to avoid providing *de facto* approval of these council's decisions by allowing an alteration or cancellation of condition 22.
10. The WDRA concurs with the comments of Edward Orr for CWAG⁷ that growth in waste inputs cannot be solely attributed to economic growth – rather the existence of the Kate Valley landfill has lessened local bodies already lukewarm commitments to waste minimisation strategies.
11. The WDRA submits that the very existence of the Kate Valley landfill has a causative effect on waste inputs. This was unanticipated by the original hearing and the Environment Court, as such the WDRA submits that the hearing should formulate some methodology to mitigate the unanticipated effect of the landfill – namely lowered commitment to reducing the residual waste stream.
12. The WDRA reiterates its submission that the actual volumes entering the landfill are so different from those projected during the original consent hearing so as to make the entire consent fundamentally different from that which was applied for. In particular no information was provided to either the commissioners or the Environment Court regarding adverse effects caused from a higher volume or concentration of leachate production than that estimated.
13. It is the submission of the WDRA that adverse effects can not be viewed as being linear and that, for example, a doubling of inputs to the landfill will not necessarily relate to a doubling of adverse effects. As such we submit that the entire consent needs to be revisited in order to provide a more accurate Assessment of Environmental Effects.
14. The WDRA submits that an increase in total weight of waste to landfill (being a result of better compaction rates) may lead to a change of concentrations of leachate and we ask the commissioner to request further information from the applicant detailing the ability of the leachate control systems to handle the expected volumes and concentrations of leachate.

⁶ Referenced from TCL application for Resource Consent, Traffic, Hydro-Geological and Waste volume reports April 2002 and compared with TCL application for cancellation/modification of condition 22 March 2006

⁷ Submission of Canterbury Waste Action Group – June 2006 – Edward Orr

and its shareholding councils to reduce residual waste. As such we would prefer a reducing permitted truck movement figure which would result in a decreasing allowable volume of waste permitted to enter the landfill.

23. The WDRA concurs with the view of the HDC section 42A report¹⁰ in that gravel trucks should not be included in the traffic condition but that these trucks (and for that matter other non waste carrying vehicles) be limited in terms of hours of operation.
24. The WDRA notes that Tiromoana Bush was offered as a mitigating factor for the landfill, and that Tiromoana Bush will create traffic activities. The WDRA also notes that TCL is using Tiromoana Bush traffic to justify a change or cancellation of section 22. As such the WDRA concurs with the HDC section 42A report¹¹ which calls for TCL to seal the remaining section of Mt Cass road up to the Tiromoana Bush car park entrance.

¹⁰ HDC 42A report - Judith Batchelor - June 2006 Para 80

¹¹ HDC 42A report - Judith Batchelor - June 2006 Para 81