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16 April 2021

Attention: Chair of the PWDP Hearings Panel

Dear Sir/Madam

The solid waste team are taking the opportunity to respond to the submission from the Koning Family Trust and Martin Koning to rezone land from Rural to Residential at 339 Wainui Road, 145 Te Hutewai Road, 146 Te Hutewai Road, and 151 Te Hutewai Road.

The team had been unaware of the intention to request a rezone of land by the Koning Trust and Martin Koning. Therefore, this response is highlighting some of the concerns that a rezoning of land to the residential zone would have in relation to the current activities and operations and past activities at 186 Te Hutewai Road, which is directly adjacent to 146 Te Hutewai Road (currently outside of the Indicative Urban Limits). It is not intended as a technical response.

We are not a submitter to the Proposed District Plan. However, we understand following a conversation with the Council's District Plan Team that the panel can give due consideration to the effects on parties that have not submitted.

While this letter is in direct response to the Koning Trust rezone application, we ask that similar consideration be taken when residential development or a rezone is sought nearby or adjacent to transfer stations, resource recovery centres, known dump sites and closed landfills either with or without current resource consent.

The solid waste team would like to draw attention to information that is considered prudent to this rezone application, but which is not evident in the application by Bloxam, Burnett, & Olliver. This letter is intended to highlight to the panel some potential effects on the solid waste and resource recovery operations of Waikato District Council.

We would expect a more technical report is carried out giving regard to the reverse sensitivity effects on these operations at 186 Te Hutewai Road, as well as the impact an unlined closed landfill would have on any future residential development.

### **186 TE HUTEWAI ROAD**

The Waikato District Council own approximately 15 hectares of rural land at 186 Te Hutewai Road. Raglan. The site is under current contract to Xtreme Zero Waste which operate a number of waste and recovery services on behalf of the Council for benefit of the community and wider district.

This services currently operating are:

- a transfer station for waste and recycles,
- a recycling sorting operation,
- a public drop off for waste, recycles, green waste, and recoverable materials
- a collection point for hazardous waste (excluding asbestos),
- e-waste collection,
- mulching of green waste on site,

- composting of food waste,
- a reuse shop,
- a metal yard,
- a woodyard,
- a clean fill site,
- an education hub
- Closed landfill monitoring (undertaken by Waikato District Council).

### Closed landfill

186 Te Hutewai Road is also the location of a closed landfill. The landfill is situated on the northern boundary of the site – IMAGE 1, which is adjacent to the proposed land for rezoning – IMAGE 2.

The Raglan Landfill closed in 1998. During its operational life, the landfill served the Raglan community and surrounding areas and at times received domestic rubbish collections from Whatawhata, Temple View, and Te Kowhai.



IMAGE 1 – area indicating Raglan closed landfill in red at 186 Te Hutewai Road

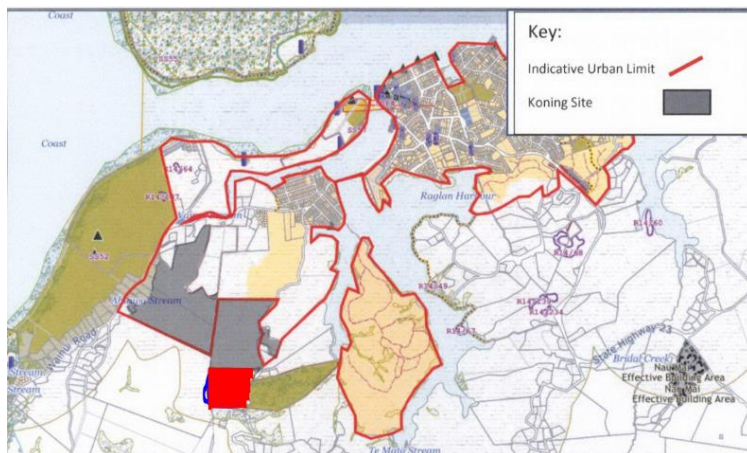


IMAGE 2 - the Koning Land Holding are shaded in grey and 186 Te Hutewai Road in red<sup>1</sup>

### Characteristics of the Landfill

<sup>1</sup> Proposed Waikato District Plan submission form (customer 33719 and 46367)

The land occupies approximately 2.4 hectares of the site. The landfill is on the side of a hill dropping 10 meters to undulating land to the North and East. the area closest to Te Hutewai Road.

A small stream crosses the site immediately below the landfill area. The stream originates on the site itself above the operating landfill at the southern end. This stream continues through to the proposed land for rezoning, where a wetland is maintained and has a number of sample points – IMAGE 3.

The landfill commenced operation at a time when it was not common to provide liners beneath landfills. Consequently, no liner was installed. The site was originally a swamp. There is effectively no barrier between the landfill and the underlying soils and groundwater.<sup>2</sup>

#### SCHEDULE 2 – SAMPLING POINT SCHEMATIC

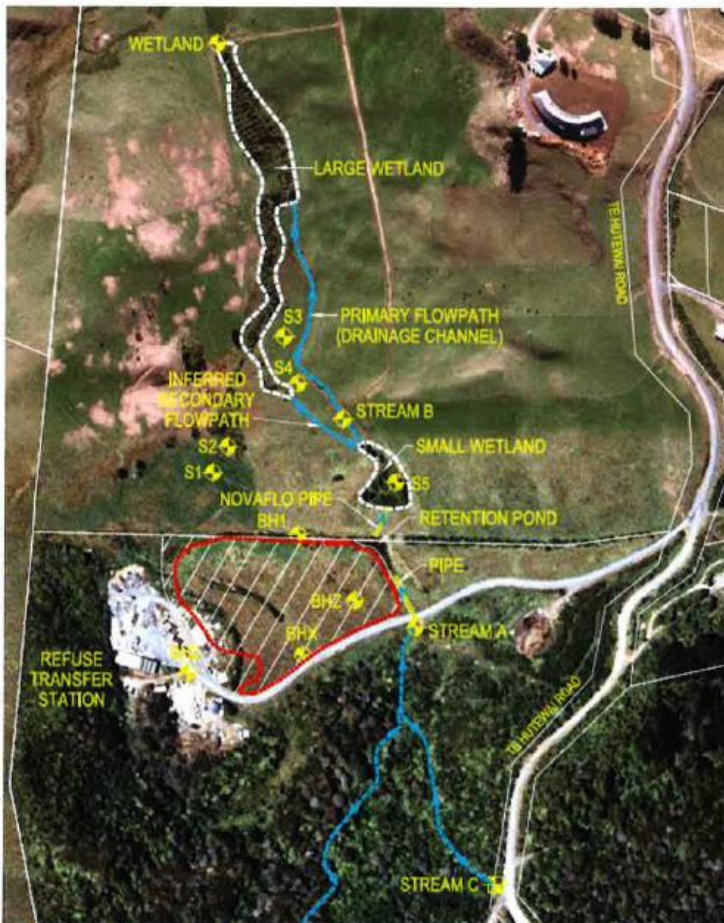


IMAGE 3 – Raglan landfill, stream, wetlands and monitoring/sampling sites

#### Responsibility for closed landfills

The responsibility of the landfill lies with the Waikato District Council. It is Council's responsibility to ensure that the landfill receives appropriate and necessary aftercare and monitoring to minimize adverse effects caused by the landfill. There are currently three active resource consents on the Raglan landfill issued by Waikato Regional Council for the aftercare of the landfill.

Landfill sites will remain the responsibility of the Waikato District Council for the duration of the monitoring, that is, until the monitoring results indicate insignificant discharges into the environment. Currently the resource consents for the Raglan landfill remain until 2034. Following, Waikato District Council will undertake a

<sup>2</sup> Raglan Landfill aftercare and monitoring Plan, Beca Carter Hollings & Ferner LTD, 1998

technical assessment on whether the landfill will require further monitoring. Waikato Regional Council will review and issue a final decision.

The following table (table 1) identifies closed landfills being monitored by Council (note included is a current resource consent for composting food waste at 186 Te Hutewai Road).

<b>Site/Closed Landfill</b>	<b>Location</b>	<b>Consent #</b>	<b>Description</b>
Parker Lane	Parker Lane Tuakau	AUTH950575.01.02	Discharge leachate to ground
Parker Lane	Parker Lane Tuakau	AUTH950576.01.02	Discharge of stormwater
Parker Lane	Parker Lane Tuakau	AUTH950577.01.02	Discharge contaminants to air
Elbow Road	Elbow Road Pukekohe	AUTH950578.01.01	Discharge of contaminants to land
Elbow Road	Elbow Road Pukekohe	AUTH950579.01.01	Discharge of stormwater
Elbow Road	Elbow Road Pukekohe	AUTH950580.01.01	Discharge contaminants to air
Raglan closed landfill	186 Te Hutewai Rd	AUTH137014.01.01	Discharge to land (Compost)
Raglan closed landfill	186 Te Hutewai Rd	AUTH950582.01.02	Discharge of leachate onto or into land
Raglan closed landfill	186 Te Hutewai Rd	AUTH950583.01.02	To divert and discharge stormwater
Raglan closed landfill	186 Te Hutewai Rd	AUTH950584.01.01	Discharge contaminants to air
Huntly closed landfill	McVie Rd, Huntly	AUTH950586.01.02	Discharge of leachate onto or into land
Huntly closed landfill	McVie Rd, Huntly	AUTH950587.01.02	Discharge of clean stormwater to Kimihi stream
Huntly closed landfill	McVie Rd, Huntly	AUTH950588.01.01	Discharge contaminants to air
Te Kauwhata closed landfill	Rata St, Te Kauwhata	AUTH118817.01.01	Discharge contaminants into land, water and air
Ngaruawahia Closed landfill	Great South Rd, Ngaruawahia	AUTH135911.01.01 AUTH135911.02.01	Discharge of landfill gas to ground Discharge of leachate to ground
Les Batkin Reserve	River Rd, Tuakau	N/A	
Kowhai	Kowhai St Tuakau	N/A	
<b>Transfer Stations and Resource Recovery</b>	<b>Location</b>		<b>Description</b>
Resource recovery centre and transfer station	186 Te Hutewai Rd Raglan	N/A	Resource recovery and transfer station
Huntly Transfer Station	93 McVie Rd Huntly	N/A	Transfer station, resource recovery (under development)
Te Kauwhata Transfer Station	Rata Street Te Kauwhata	N/A	Transfer station, community reuse centre (future development)
Tuakau Resource recovery	Bollard Rd Tuakau	N/A	Resource recovery and transfer station (not yet operating)

TABLE 1 – Landfills monitored by Waikato District Council

There are two closed landfills in the district under private ownership – a Department of Corrections facility at Waikeria, and a timber waste landfill in Pokeno.

There are also some cleanfill operations in the district. Cleanfill sites which accept less than 2500m<sup>3</sup> per annum are permitted under the Waikato Regional Council rules.

Monitoring the cleanfill operations is a responsibility of the Waikato Regional Council. Risks associated with cleanfill operations are disposal of unsuitable material (material not defined as appropriate for cleanfill), settlement, slope failure, and erosion. Typically, cleanfills are not strongly regulated, although the Ministry for the Environment is working toward better regulation of cleanfill operations, and in general, there is a need for more stringent conditions and monitoring<sup>3</sup>.

#### Monitoring of landfills

Council monitors all closed landfills subject to Resource Consents (including Raglan) with regard to both the discharge of contaminants to the environment and slope stability.

Monitoring allows the detection of any adverse effects that may occur over the course of time,

- to mitigate any adverse effects currently occurring on the environment,
- to mitigate any predicted adverse effects,
- to avoid raising any additional adverse effects to control nuisance.

#### Stream and wetlands on 186 Te Hutewai and 146 Te Hutewai Road

The wetlands were developed and enhanced in 1998 with the closure of the landfill. There were a number of drains installed to capture the landfill leachate. A stream passes through the landfill onto 146 Te Hutewai Rd and 339 Wainui Road and continues in the direction of the wastewater treatment plant – Image 4. Other water discharge or springs that pop up within the landfill are directed to pass through the wetland system.

The large wetland on 146 Te Hutewai Road was contoured and planted to ensure the maximum amount of water/plant contact. The plantings were undertaken by Whaingaroa Harbour Care.

There are regular landfill inspections undertaken by Waikato District Council. Sampling is undertaken by Hamilton City Council Shared Services Laboratory as part of a shared services arrangement. Waikato Regional Council may undertake random audits at their discretion. Sample locations are identified on Image 3.

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<sup>3</sup> Waikato District Council Waste Assessment, February 2018





IMAGE 4 – Stream arising at 186 Te Hutewai Rd<sup>4</sup>

### **Food waste and green waste**

Food waste and green waste are current activities on site. Green waste mulching is undertaken at 186 Te Hutewai Road. The green waste is dropped off by the public and mulched at the time of drop off or a later date.

A Raglan kerbside food waste collection service is currently managed by Xtreme Zero Waste. Food waste is collected each week from residential properties in Raglan and returned to site where it is composted with green waste in an enclosed horizontal composting unit. The current resource consent for this operation is identified in Table 1.

### **Other activities**

186 Te Hutewai Road also operates as transfer station and a drop off location. This means waste and recycles are brought onto site following daily household kerbside collections. Waste for disposal to landfill is transferred to bulk transport bins, prior to removal and recycles are sorted and baled for shipping off site.

Members of the Public (mostly from the community and surrounding areas) also bring in waste, resources, or recycles directly to site. These drop off activities can involve self-sorting of recycles, delivery of materials that may be repurposed for sale, waste directly transferred to bulk transport bins, green waste delivered for mulching and the disposal of clean fill.

Xtreme Zero Waste also welcome schools and businesses/organisations to site for educational purposes and general site visits.

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<sup>4</sup> Raglan Landfill aftercare and monitoring Plan, Beca Carter Hollings & Ferner LTD

## **Site Operations**

The centre operates business hours but is also open on weekends.

Generally, the activities at 186 Te Hutewai Road are compliant with the District Plan rules and resource consents.

It is anticipated with the expected growth of Raglan township, the site at 186 Te Hutewai Road will become busier as it serves a growing urban population.

## **RURAL CHARACTER / REVERSE SENSITIVITY ON EXISTING RURAL OPERATIONS**

In a rural setting, there is an expectation that some noise, odour, and dust are part and parcel of the characteristics of living in the country or in the rural zone. Generally, there are less dense residential populations, more productive landscapes, and small or medium scale commercial activities. Therefore, some farming odours, commercial activity, and rural noise are expected and accepted.

It is a different type of lifestyle to that of living in a medium density residential development. Furthermore, these activities, traffic movements, and noise types may not be perceived as normal or acceptable by an urban dweller in a medium residential development.

Visual aesthetics of buildings and surrounds tend to have a higher value placement in urban settings. The centre's appearance may not be compatible in a more urban developed environment. The existing character of the site is more akin to a rural or commercial site.

With regard to building nearby or next to a closed, unlined landfill - there are cases that can be considered – for example, Rototuna Hamilton and Ngaruawahia, where residents and property values have potentially been impacted from gas migration from nearby landfills.

The solid waste team request that consideration be given to a buffer zone at the northern boundary to ensure that any future residential type of development can cohabitate harmoniously with the current operations and closed landfill at 186 Te Hutewai Road.

## **CONCLUSION**

The solid waste team have concerns that this proposal, due to its proximity, will create a reverse sensitivity to current activities that are in operation for the benefit of the Raglan community. Presently, the application does not address the operations at 186 Te Hutewai Road or any reverse sensitivity impacts.

The team have concerns that the closed landfill at 186 Te Hutewai Road or the wetlands on 146 Te Hutewai Road have not been identified or referenced.

The team would anticipate that any consideration for rezoning would hinge on an in-depth assessment of environmental effects of a residential development in proximity to a closed and unlined landfill and an assessment of the reverse sensitivity impacts on a resource recovery centre.

The solid waste team would like to thank you for considering our concerns, and if you need any further information, please contact the solid waste team [pat.cronin@waidc.govt.nz](mailto:pat.cronin@waidc.govt.nz) or [phil.ellis@waidc.govt.nz](mailto:phil.ellis@waidc.govt.nz)

Ngaa mihi nui,

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Waste Minimisation and Resource Recovery