

If calling ask for: **Craig Thew**

HPRM Record Number: SW-29-2-21-17

17 February 2021

Regulation - Consents
Hawke's Bay Regional Council
Private Bag 6006
Napier 4142

Attention: Greg Shirras – Senior Consents Planner
Email: Greg.Shirras@hbrc.govt.nz

Please find a submission from the Hastings District Council (Asset Management) and Napier City Council (Infrastructure Group) in **SUPPORT** of the applications as follows:

Consents to discharge contaminants to air and to land, and to divert and discharge water and stormwater; namely

AUTH-122021-02	to discharge leachate from a landfill operation into and onto land, in circumstances that may result in contaminants entering water - Areas A, B and D
AUTH-113990-04	to discharge contaminants into the air from Areas A, B and D of the Omarunui Landfill - odour and landfill gas derived from the decomposition of refuse and dust.
AUTH-125046-01	to discharge contaminants into the air from Area B of the Omarunui Landfill - odour and landfill gas derived from the decomposition of refuse and dust and the products of controlled combustion of landfill gas
AUTH-125114-01	to discharge contaminants (solid waste and leachate) to land - Area B
AUTH-125115-01	to divert and discharge water from groundwater in Area B (pumped dewatering) to the Upokohino Stream via the stormwater system
AUTH-125116-01	to divert stormwater from a municipal landfill and discharge treated stormwater to water via stormwater treatment ponds - Area B

Overview

The HDC (Asset Management Group) and NCC (Infrastructure Group) **support** the application for resource consents to the Hawke's Bay Regional Council (HBRC) for the construction and operation of the new area, Area B at Omarunui Landfill.

We **support** the resource consents application in its **entirety** for reasons provided below:

That by **not** granting the regional resource consents:

- i. Transporting waste out of district to another appropriate landfill will come at increased financial cost to ratepayers. This is estimated to be double the cost of extending Omarunui as documented in the Waste Futures Business Case document¹.

¹ www.hastingsdc.govt.nz/assets/Document-Library/Plans/Waste-Management-and-Minimisation-Plan/Appendix-6-Waste-Futures-.pdf

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- ii. Carbon emissions will increase with the associated increased transport to any out of district approved facilities. Out of district facilities may be as far as Manawatu/Rangitikei region. Transporting waste long distances will not align with the Climate Change Response (Zero Carbon) Amendment Act 2019 targets to reduce emissions of all greenhouse gases to net zero by 2050.
- iii. There will be an issue with commercial operators unable to take the waste they collect to Omarunui landfill once it has reached its storage capacity. Councils are not obligated to provide a transfer facility and would require more truck movements, as noted above, to an out of district approved facility.
- iv. The two main Regional Transfer Station (RTS's) – Henderson Road and Redclyffe are not equipped to be consolidation points for all of the districts waste and prepare that waste for transport out of district. These RTS's would require a Mechanical Materials Recovery Facility and larger site at considerable cost.
- v. There will be an anticipated increased cost to ratepayers through kerbside refuse collection cost increases. Through the WWMP preparation and Hearing process small households raised concerns² on the proposed kerbside collection services rollout about the increased costs. These costs to households would see households of single and two people living today impact upon nearly 60% of Hastings district population³.
- vi. Illegal dumping will increase if there is a large increase in disposal costs, as people may find it easier and more convenient to 'fly-tip' rather than accept the kerbside refuse disposal cost increases. This will have a negative effect on the environmental and health risks to the wider community.
- vii. The movement of milliscreened waste may result in cultural concerns as this material would need to be transported for longer distances and potentially past Marae and sensitive areas to tangata whenua.
- viii. There are no other large landfills on the East Coast of the Central North Island with the capacity to dispose of the volumes that Omarunui Landfill does.

By **granting** the regional resource consent, the proposal will have positive benefits to ratepayers in the Hastings and Napier district for the following reasons:

- i. The Waste Management and Minimisation Plan (WMMP)⁴ – Action 8F of the Action Plan – Develop Omarunui Landfill for future residual waste disposal sets a clear Goal and Objective as follows: Goal 1 REDUCE, RECOVER AND RECYCLE MORE WASTE IN ORDER TO CONTRIBUTE TO THE NEW ZEALAND WASTE STRATEGY GOAL: “REDUCING THE HARMFUL EFFECTS OF WASTE”. Objective 1: To reduce total amount of waste to landfill per person in Napier and Hastings, particularly with regard to organic waste e.g. green waste and food waste.
- ii. There will be an increased focus from central and local government in the coming years on waste management and waste minimisation and new programmes are introduced to support a circular economy and reduce waste to landfill. This will not remove the need for landfills but should reduce the volume of waste.
- iii. HDC has implemented new kerbside collection services and are undertaking a review to make improvements at the Regional Transfer Station at Henderson Road to increase resource recovery.
- iv. As part of the wider goal to 'Reduce the Harmful Effects of Waste' HDC aim to increase the number of rural recycling facilities to allow for more recycling across the district.
- v. The landfill is a safe and accessible place to deposit waste for long term storage. The likes of asbestos are GPS mapped for future reference, and are stored and handled in line with global best practice.
- vi. That the potential adverse effects on the environment are no more than minor. Any residual adverse effects can be adequately mitigated by measures, management practices and conditions of consents.
- vii. That the proposal is consistent with Part 2 provisions of the Resource Management Act 1991, and the relevant objectives and policies within the Hawke's Bay Regional Policy Statement and Regional Resource Management Plan.

² We received 6165 written submitters with about 70 individuals and organisations addressing the hearings panel with their views.

³ 2018 Census; Household occupancy size, 23.5 % single people, 34.5% two people living together in Hastings district.

⁴ www.hastingsdc.govt.nz/assets/Document-Library/Plans/Waste-Management-and-Minimisation-Plan/Waste-Management-and-Minimisation-Plan-2018-2024.pdf

- viii. That the proposal substantially implements the goals, objectives and action plan contained with the Waste Management and Minisation Plan 2018 – 2024 (WMMP)⁵. The now adopted WMMP was prepared by HDC and NCC and was widely consulted upon with stakeholders.

The HDC (Asset Management Group) and NCC (Infrastructure Group) **seek the following recommendation** from the Hawke Bay Regional Council (HBRC):

To **grant** the regional resource consents and **accepting** the variations to existing regional resource consents for the construction and operation of the new area, Area B at Omarunui Landfill to ensure they:

- a) Provide sufficient space with associated regional consents to enable the ongoing efficient operation of the Omarunui Landfill and extend its ability to receive waste; and
- b) Maximise cost-effectiveness and environmental compliance by utilising the existing infrastructure established at the Omarunui Landfill site to enable the construction management and filling of Area B.

The HDC (Asset Management Group) and NCC (Infrastructure Group) **wish to be heard in support** of this written submission at any Hearing.

Yours sincerely



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By way of email a copy of this submission has been served upon:

- Michaela Tinker (Hawke's Bay Regional Council - Hearings Administrator) michaela.tinker@hbrc.govt.nz
- Martin Jarvis (Hastings District Council - The Applicant) martinlj@hdc.govt.nz

⁵ Required to be prepared under the Waste Minimisation Act 2008.