

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES
PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Hearing Stream 17 – Chapter 18A – General
Industrial Zone

**STATEMENT OF EVIDENCE OF VANESSA CLARE VAN UDEN ON BEHALF OF SCOPE
RESOURCES LIMITED (FS3470)**

Dated this 5th day of June 2020

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1 Introduction

- 1.1 My name is Vanessa Clare van Uden. I have the qualification of Master of Business Administration and Bachelor of Commerce.
- 1.2 I own a consultancy business and work in a number of different industries doing contract management, quality and health & safety systems, advocacy, and strategic advice. I have owned my business since 2002. From 2007-2010 I was engaged by Scope Resources Limited (SRL) as Contract Manager for the Victoria Flats landfill ("Landfill") contract.
- 1.3 From 2007 – 2016 I was an elected representative of the Queenstown Lakes District Council (Mayor from 2010-2016). Prior to setting up my own business in 2002 I was employed by Queenstown Lakes District Council (QLDC) as Contracts Manager. This included responsibility for managing the Landfill contract with SRL. I held this position from 1998 – 2002.
- 1.4 Currently I am engaged by SRL to undertake contract and system (quality and health & safety) management services for the Landfill and as liaison with QLDC in respect of this part of the Landfill contract. I am authorised to provide this evidence on behalf of SRL.

2 The Victoria Bridge Landfill

- 2.1 The Landfill was consented in 1998 and commenced operation in July 1999. The Solid Waste Landfill Contract ("Contract") was signed on 12 May 1999. The parties to the Contract are QLDC and SRL. The Contract is a BOOT (Build Own Operate Transfer) contract and provides for the design, build and operation of the Landfill by SRL on land owned by QLDC. A BOOT contract requires the contractor to construct and operate the Landfill for the term of the contract and then transfer it back to the QLDC.
- 2.2 The term of the Contract is until 2034 or until the date at which the operation of the Landfill is no longer consented by ORC. The regional council consents to operate the Landfill are issued in the name of QLDC. The Landfill provides solid waste services for all of the communities of the Queenstown Lakes district (resident population 41,700) and Central Otago district (resident population 23,100).

2.3 The Landfill is defined as strategic asset by QLDC (Significance and Engagement Policy). As the only landfill servicing the Central Otago and Queenstown Lakes district communities it is, therefore, a significant resource for the region and district.

2.4 The Landfill is situated 17km east of Frankton on the south-side of SH6 between the Victoria Bridge and the Nevis Bluff. It is accessed via Victoria Flats Road (off SH6) and then by a 200m access road. The access road is not open to the general public. Waste arrives principally as 'transfer loads' from transfer stations at Frankton, Wanaka, Alexandra, Cromwell and Ranfurly. Waste is also delivered by commercial operators with approval to dispose of waste at the site for example contractors who provide skip bin services for hotels, activities and builders or civil contractors carting demolition and construction waste to site.

2.5 The hours of opening of the Landfill are:

Monday to Friday 7:00 a.m. to 5:00 p.m.

Saturday 7:00 a.m. to 1:00 p.m.

Sunday Closed

Currently the site is closed on Christmas Day and Good Friday¹

There are three full-time staff who operate and work on site at the Landfill – a Landfill Manager and two operators. There is one part time Administration person who works 15 hours per week on site at the Landfill.

2.6 I understand that the site was identified in 1994 by QLDC as being particularly suited for a Landfill because it:

- was remote, and not socially sensitive because of the distance from residential dwellings
- had potential for a long life. This was assessed as 80 years with potential to extend further
- had good access and ease of operation i.e. open, flat land where machinery was able to operate safely and efficiently
- was relatively flat land and could be readily engineered to be a sanitary landfill
- was a cost effective solution for both Wanaka and Queenstown communities and ultimately Central Otago district as well

¹ There is no condition in the designation regulating hours – they are "self-set"

2.7 I have made enquiries of consultants who work in the industry and based on my discussions with them estimate that the cost to “consent” a new sanitary landfill to cater for the Southern Lakes/Central Otago population would be in the range of \$3.0 – 3.5 million². Further, it is estimated that costs to complete the physical works to construct a sanitary landfill would be somewhere in the order of \$20million, assuming the landfill includes a landfill gas collection and destruction system. This does not include the value of the land that would have to be acquired, which would be on top of those costs

2.8 SRL have invested significantly more than these amounts in the Landfill in the last 21 years of its operation and are currently committed to spending \$8 million to retro-fit a landfill gas collection and destruction system. In 2019, as required by the National Environmental Standard for Air Quality 2004, the Otago Regional Council reviewed the resource consent and it was amended to include a requirement for the commissioning of a landfill gas collection and destruction system.

3. The “life” of the Landfill

3.1 The “life” of a landfill is a function of the land area available and the rate of filling. Currently the estimated remaining “life” of the Landfill is 40 -50 years. This varies over time depending on the rate of filling i.e. the less waste disposed of by the community the longer the “life” of the landfill.

3.2 To provide solid waste disposal services at another location, should the current landfill be forced to close or to reduce its operations owing to inappropriate development nearby, would be a significant, costly, and extremely challenging exercise requiring:

- a) Identification of a new suitable site(s) within the district that would:
 - Be remote, not socially or environmentally sensitive and consentable
 - Have good access and be relatively flat for ease of construction and operation
 - Be centrally located to be able to cost effectively serve the communities of Queenstown, Wanaka, and Central Otago
- b) Purchase of the land
- c) Consenting of the activity
- d) Construction of the landfill

² The figures discussed were for approximate consenting costs of other landfills such as Kate Valley in Canterbury (2003) \$2-3million; Auckland Regional Landfill (current) \$10 million; Whangarei (7-8 years ago) \$2 million; Nelson (in the early planning stages) \$3.5 – 4.5 million

- 3.3 The operation of the landfill requires a significant investment up front and throughout the life of the landfill.
- 3.4 In my experience, there are a number of operational challenges inherent in any landfill operation. These range from windblown refuse to pests and landfill gas. For many years, the predominant challenge at Victoria Flats was windblown refuse and in particular plastic bags. Actions taken over the last 21 years to manage this issue include:
- Construction of a secondary 8 metre wind fence (in addition to what was originally required)
 - Purchase of 8 hooker bins that can be used by contractors responsible for Transfer Station operation so that they can leave full bins on the ground until the wind drops
 - Regular manual refuse pickups both within the site and along adjacent property and roads
- 3.5 In recent years, the production of landfill gas has increased. The Landfill is located in an area of traditionally low rainfall and as such is a very dry landfill.
- 3.6 Prior to 2008 the Landfill did not receive sewage sludge from QLDC. With the commissioning of the Project Pure sewerage treatment plant in Wanaka, QLDC needed to dispose of the sludge. From 2008-16 sewage sludge was received by the Landfill. Over that period of time the addition of the moisture from the sludge activated the Landfill and more landfill gas and ultimately "odour" was produced. In 2016 when the sludge began to be transported to Kings Bend in Southland for disposal the intensity of the odour subsided.
- 3.7 Over the last three years considerable work has been undertaken to design and begin construction of a landfill gas collection and destruction system. In addition, to manage the Landfill gas odour the Landfill staff regularly spray with a deodoriser. A cannon spray-mister has been purchased to further mitigate the occurrence of odour at the Landfill.
- 3.8 I am aware that in the last year SRL has received 10 complaints regarding odour as follows.
- | | |
|--------------|--|
| 02 July 2019 | 3 complaints made to ORC – from Gibbston Back Road (2) and Felton Road (1) |
|--------------|--|

21 August 2019	5 complaints made to ORC – from Gibbston Highway, Gibbston area and unknown
22 August 2019	1 complaint made to ORC – from Gibbston area
08 May 2020	1 complaint made to QLDC from the adjoining neighbour, Cardrona Cattle Company Limited (CCCL), which referred to odour in a list of other issues but provided no detail.

- 3.9 With regard to the complaints on 21 and 22 August 2019 a staff member from Otago Regional Council attended and a FIDOL³ survey was completed. The odour was found to be strong but not offensive beyond the boundary.
- 3.10 SRL uses its best endeavours to operate in compliance with the consent conditions applicable to the operation of the Landfill but those conditions are not absolute. For example, while members of the public may believe there is a requirement for no odour to be discernible at all outside the boundary, it is not simply a case of a person smelling something that may or may not be associated with the Landfill operation and that then translating into a valid complaint. Rather, the consent conditions require an appropriately trained enforcement officer from Otago Regional Council to validate the complaint in accordance with the FIDOL assessment referred to above.
- 3.11 SRL's concern is that at present there are relatively few residents or others living or working in the vicinity of the Landfill owing to the Rural zoning and use of the adjacent land. That is also reflected in the modest complaint numbers, although the Landfill does still receive complaints. Any increase in people and incompatible activities will inevitably bring with it a much greater number of complaints, and implications for tighter controls on the operation of the Landfill, particularly when regional consents are being renewed. This may lead to increased consenting and operational costs and in a worst-case scenario the early closure of the Landfill.

³ Assessing whether an odour has an offensive or objectionable effect requires an overall judgement that considers the frequency, intensity, duration, offensiveness/character, and location of the odour event

4 Submission by Cardrona Cattle Company Limited seeking an industrial zoning

- 4.1 As I understand it, the submission by CCC seeks a General Industrial Zoning over its land adjacent to the Landfill. Part of the land sought to be rezoned is also included in the Landfill designation as “Landfill buffer”.
- 4.2 With reference to Mr Bartlett’s⁴ evidence, approval of the zoning will generate a substantial amount of traffic, as well as introducing a significant number of workers and trade customers to the vicinity.
- 4.3 A substantial increase to the traffic using Victoria Flats Road and the intersection with SH6 is of concern to SRL from a safety point of view. Large truck and trailer units frequently enter and exit the Landfill site. Additional traffic of the volumes identified creates a risk for the drivers and Landfill staff through traffic failing to give way or travelling too fast.
- 4.4 I also understand CCC to be seeking removal of prohibited activity status for activities in the zone, residential activities (custodial and worker accommodation) and some retailing. In addition to increasing the density of people in the vicinity, this also has the potential to introduce a range of activities that are simply incompatible with the operation of a regional landfill on the adjacent land.
- 4.5 In addition to my evidence above concerning odour complaints, I refer to the expert evidence of Dr Rissman on odour emissions, and of Mr Geddes who describes the implications of residential and other activities close by for the noise controls governing the day to day operations of the Landfill and the potential also for noise and odour complaints.
- 4.6 Regarding the potential for noise complaints from nearby residential activities the Landfill’s hours of operation will also impact on the likelihood of complaints. As identified above the Landfill currently operates from 7am to 5 pm from Monday to Friday and from 7am to 1pm on Saturday for 52 weeks of the year. The Landfill is only closed on Sundays and two public holidays during the year i.e. Christmas Day and Good Friday. As the operational hours are not restricted under the designation conditions, they may be changed to suit operational conditions.

⁴ At paragraph [24]

4.7 While it is the case that SRL owns land to the south of Frankton (Kingston highway) some 33 km away from the Landfill, that benefits from an Industrial zone, the sole motivation for SRL to file the further submission is its very real and genuine concern for the continued and sustainable operation of the Landfill, and in particular from the irreversible effects of allowing an increase in the density of people and incompatible activities to locate on the adjacent land.

Vanessa van Uden

5 June 2020