

In The Matter of the Resource Management Act 1991 (“the Act”) And
In The Matter Rolleston Plan Change 73 – Holmes Block

SUMMARY STATEMENT – SOLID WASTE MANAGER

Introduction

1. My name is Andrew Gareth Boyd. I have prepared a Statement of Evidence as the Selwyn District Council’s Solid Waste Manager with respect to Plan Change 73. My qualifications and experience are set out in that statement.
2. I have considered the plan change application in relation to the reverse sensitivity effects on the operations at the Pines Resource Recovery Park (‘Recovery Park’), Council’s sole Transfer Station and Composting operation.
3. I have read all submissions, statements and evidence provided that relate to the Recovery Park.
4. The following paragraphs summarise my observations and conclusions.

Key points

5. The intensification of dwellings proposed under PC73 will significantly increase the number of potentially sensitive receptors near the Recovery Park, and therefore the likelihood of complaints. I am principally concerned that future complaints do not lead to constraints on the operation of this significant infrastructure for Council.
6. Council has invested very significant levels of ratepayer funding into infrastructure at the Recovery Park (estimated Asset value of \$15M after current developments) and the Pines Waste Water Plant (Asset value of \$89M in 2019). Extensive further development and investment by Council is planned or is already underway at both sites.
7. These facilities are processing the district’s most unpleasant and odourous wastes: our refuse, our putrescible food and garden organic waste and human and trade wastewater.
8. Council strategically located the Recovery Park where it is, alongside the Waste Water Plant, specifically because the future housing development of Rolleston was planned to be South of the township.
9. Selwyn is the fastest growing district in the Country. The pressure on these assets in terms of volumes is growing rapidly. We’ve seen a 15% increase in general waste tonnes in the last year compared to the year prior. Organic tonnes are projected to increase from the 8000 tonne per annum now, up to 53,000 tonnes by 2044.

10. Waste (and organic matter in waste particularly) is a significant contributor to climate change. In order to meet our obligations under the Zero Carbon amendment Bill, as well as the Waste Minimisation Act 2008 we will need to divert additional organic (food and garden) waste (and other waste streams) from the refuse. This facility's ability to receive and process these wastes is key to meeting our legislative obligations.
11. There are many examples of conflicts between existing facilities and encroachment by new developments – whether it be odour, dust or noise. I noted some examples of these in my Officer Comments document dated 1 September 2021. While it can be argued some of these were breaching their consents, the crux of the matter is that the district plan allowed a retail and hospitality complex, and a mixed use industrial complex incorporating residential activities, to be developed in very close proximity to a heavy industrial zoned site, thereby introducing more sensitive receptors to the industrial area. I mentioned a noise related example (Western Springs), while although quite different to odour, the intent was to demonstrate incompatible land uses or developments encroaching on established activities.
12. There is an opportunity to err on the side of caution and to not do the same here, so that when people look back on this in 5 or 10 years, they don't shake their heads wondering how residential development was allowed to proceed to the extent that it is currently proposed, so close to the Recovery Park.
13. I propose a larger buffer than the 600m proposed, to safeguard the future operation and expansion of these critical community infrastructure assets.
14. The applicant's air quality consultant Ms Nieuwenhuijsen was initially comfortable to use and cite the Victorian and South Australian EPA guidelines to guide their odour setback distance when the compost volumes were at an assumed 4200 tonnes per annum.
15. Ms Nieuwenhuijsen in Appendix H Odour Assessment, page 6 states *"In summary on the basis that the throughput is maintained close to the current throughput, i.e., limited to 4,200 tonnes/annum and there is a high degree of control in the manufacture of the compost, the leachate management (particularly maintaining both of these in an aerobic state), and given the location of the proposed residential area, a buffer distance of 600 m is considered to be reasonable."*
16. In my principal evidence I advised that it was incorrect to assume site capacity had been reached at 4200 tonnes per annum, and that organics tonnes were already nearly double that, and forecast to increase to 53,000 tonnes by 2044.

17. All of the Australian EPA buffer guidance provided and relied upon above, recommend buffer distances of greater than 1000m. With Victorian EPA recommending a separation distance of greater than 2000m. This shows clearly that even at 1/4 of the total consented composting tonnes allowable, the recommended separation distance is greater than 1,100m.

Types of feedstock	Technology being used	Size of the plant	Recommended separation distance (metres)
Green wastes	Open air receival	1,200 tonnes per annum	>600
	Open turned windrow	14,000 tonnes per annum	>1,100
	Open air maturation	36,000 tonnes per annum	>2,000
		50,000 tonnes per annum	>2,000

Where a greater separation distance is not possible, the design should be upgraded or other controls applied to meet the separation distance available. For example, for reference facility 1 it might be assessed that the highest risk of odour is the open air receival and that if an enclosed receival area was developed the recommended separation distance could be reduced.

(Environment Protection Authority Victoria, Designing, Constructing and Operating Compost Facilities, (2017), 9)

18. The applicant's air quality consultants' opinions are that there is low potential for adverse effects and that a 600m buffer is considered to be reasonable. The air quality consultants engaged by the applicant contend that with the odour and dust management plan controls put in place under the new air discharge consent at the Recovery Park, that the EPA buffer distance recommendations can be reduced. However the odour and dust management plan controls are quite standard for composting facilities, with nothing unusually prescriptive in the Recovery Park's document. On that basis I disagree that the separation buffer should be reduced from the EPA recommendations on the basis of the odour and dust management plan controls.
19. I understand that the air quality consultants advise in their statements that the current proposed buffer should be sufficient. With no disrespect intended, I contend that consultants were also engaged in the planning stages of other developments where conflicting developments have occurred, and in which the expert evidence equally would have advised that there were not issues to be concerned about, or that there was low potential for adverse effects. When this plan change process is completed, should PC73 proceed as currently proposed, the applicant will go ahead and develop the site and sell sections, the air quality consultants will be engaged on work elsewhere, and the district ratepayers will be left to carry the cost of the encroachment of urban development on this critical infrastructure.
20. It has been suggested by Ms Nieuwenhuijsen that Council could invest in mitigation measures by way of facility upgrades such as forced aeration or tunnel composting. Living Earth Bromley uses tunnel composting and arguably the best current technology, yet still faces enormous upgrade costs to completely enclose the entire site, or to relocate the whole facility elsewhere as a result of odour complaints in recent years.

21. I contend that in the case of two critical council assets with a value exceeding \$100m (and growing), processing the most odourous wastes for residents, and being facilities with very high projected volume growth in the coming years, we need more assurance than “reasonable” or “low potential”. We need to be cautious.
22. I agree with Mr Bender’s concluding sentence *“I therefore consider that there is potential for the proposed plan change to result in reverse sensitivity effects on the PRRP”*.
23. Two out of three Air Quality consultants acknowledge there is a risk of reverse sensitivity. While I accept that an odour setback / buffer of 2000m may be excessive in this case, 1000m would be more appropriate and acceptable, if taken from the boundary of the mature compost area.

Conclusions

24. The odour setback distance of 600m currently proposed is insufficient for a new urban development, conflicts with accepted setback guidelines for new developments, risks constraining Recovery Park operations, and would likely add considerable expense (millions), by way of mitigation measures at this important council facility.
25. A minimum 1000m odour setback would be more appropriate and acceptable, measured from the boundary of the mature compost area.

Dated: 27 September 2021