From: Euan Kyle
To: [redacted]
Subject: RE: Response to Official Information Act request regarding Waiuiomata CLosed Landfill
Date: Friday, 18 December 2020 10:07:36 AM
Attachments: image001.jpg
image002.jpg
image003.jpg
RTA-FORM-003 Applic Disposal of Special hazardous waste v2.pdf
08.10.2020 Construction Contracts LTD 80m3.pdf
09.10.2020 Engeo 740m3.pdf
02.10.2020 Aurecon T2UH Upper Hutt Railway Station 300m3 v2.pdf
26.11.2020 - PCL contracting - 11-19 Cuba street .pdf
19.08.20 40 Hutt road - Natural ground..pdf
13.10.2020 JLP Queensgate 12m3.pdf
Macaulay"s Seaview - soil test results.pdf
hccsmalllogo_12fb0640-f486-4c5a-a775-f4ab1b1dfb5d.jpg
12153HaHEmailSignatureFINAL_3cd6181d-2156-4dde-9fbd-b6f7f302ed05.JPG
13139RubbishandRecyclingEngagementEMAIL_5ddea2b0-952f-4aed-8ca4-d26306e488b2.jpg

---

18/12/2020

[redacted]

Dear [redacted]

Request for Information – Local Government Official Information and Meetings Act 1987

We refer to your official information requests regarding Waiuiomata Closed Landfill.

Part of the information you have requested is enclosed. However, we are still collating information regarding question 4 and we will supply this as soon as possible.

See responses below and attached.

12. Can you tell me how many trucks are not using the wheel wash and can you tell me if that company was informed verbally or in writing and if so can I please be supplied a copy of the correspondence

- Use of the wheel wash is managed by the site operator on a day-to-day basis, with the decision upon whether trucks are required to utilise the wheel wash dependent upon site conditions. We understand that the company responsible for tracking the material was instructed verbally. I believe this satisfies query 12.

13. Can I also have any correspondence and documents regarding material taken to the Cleanfill from SLURs and how that is tested and what assurances are in place to keep the site clean from contaminants each time material is accepted from a SLUR.
14. Can you tell me how many SLUR sites the Wainuomata has accepted material from in Stage 3
15. Is this information that you have or is there someone else I need to ask about SLURs?

- We have received applications from 7 sites listed on the SLUR. 6 have been accepted and 1 rejected from Wainuiomata during the operation of Stage 3. We have attached the acceptance certificates and email confirming rejection to this email which we believe satisfies queries 13, 14 and 15.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Regards,

Euan Kyle
Senior Advisor, Official Information and Privacy

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand
T 04 570 6702 W www.huttcity.govt.nz

From: Euan Kyle
Sent: Friday, 11 December 2020 3:38 PM
To: [redacted]
Subject: RE: Response to Official Information Act request regarding Waiuiomata CLosed Landfill

11/12/2020

[redacted]

Dear [redacted]

Request for Information – Local Government Official Information and Meetings Act 1987

We refer to your official information requests regarding Waiuiomata Closed Landfill.

Part of the information you have requested is enclosed. However, we are still collating information regarding questions 4 and 12-15 and we will supply these as soon as possible.

Regards,

Euan Kyle
Senior Advisor, Official Information and Privacy

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand
T 04 570 6702 W www.huttcity.govt.nz

Encl:
14A Waiu St - WAinuiomata -WW response.pdf
Cleanfill.pdf
Copy of RMApplications2020.xlsx
Councillor Brown - cleanfill questions.docx
Export_Output_2.xlsx
FW DRAFT - list of sites from initial GIS search.pdf
Fwd Councillor Brown - cleanfill questions docx.pdf
Pre comm 14 waiu stree1.pdf
RE (left blank).pdf
RE 14A Waiu Street - Private plan change process.pdf
RE Assistance with Auditing a Resource Consent.pdf
RE Cleanfill.pdf
RE Waiu Street.pdf
Response Letter to Official Information Request [redacted] 20201211.PDF

Cleanfill Acceptance Evaluation

Applicant:	**Organisation**:	Aurecon on behalf of KiwiRail Holdings Limited	
	Contact name:	Shauna McAuley	
	Phone number:	[redacted]	
	Email:	[redacted]	
Application date:	15 September 2020	**Application number:**	0030
Material:	**Source:**	Trentham to Upper Hutt rail line, from between locations TP01KR and TP05KR (see Figure 2)	
	Check of Selected Land Use Register	Completed	
	Description of material:	Natural ground – Alluvium material. Fill (black gravelly sand) and the top 100-150mm of natural material immediately below the fill is **excluded** from cleanfill disposal.	
	Volume/amount:	300 m^3	
Application status:	☒ Accept ☐ Reject ☐ Further information required		
Acceptance location:	☒ Wainuiomata Cleanfill ☐ Silverstream Landfill ☐ Old Wainuiomata Landfill		
Assessment comments:	**Characterised by:** Emails from Helen Davies (Aurecon), Brock Goodison, 15/9/2020.		
	Physical properties (spadable): Dry		
	Material to be managed as: Cleanfill		
Disposal instructions for applicant:	• The volume per load and timing is to be agreed in advance with the cleanfill/landfill operator. • This approval is subject to the cleanfill/landfill operator's visual inspection of the material for physical suitability to dispose. • A copy of this approval must accompany each load. • This approval: - only covers the material as characterised above. - is given on a case-by-case basis and cannot be considered as approval for any loads beyond the extent described in this acceptance form. • The applicant must establish an account in advance with: - Dimac Contractors Ltd (dimaccontractors@xtra.co.nz) for disposal to Old Wainuiomata landfill or Wainuiomata Cleanfill.		
Prepared by:	Andrea Tuohy, Tonkin + Taylor	Date: 21/09/2020	
Reviewed by:	Michael Stiff, Tonkin + Taylor	Date: 02/10/2020	

Cleanfill Acceptance Evaluation

Applicant:	**Organisation**:	Construction Contracts Limited	
	Contact name:	Stephen Prebble	
	Phone number:	[redacted]	
	Email:	[redacted]	
Application date:	08 October 2020	**Application number:**	0031
Material:	**Source:**	7-23 Port Road, Seaview	
	Check of Selected Land Use Register	Completed	
	Description of material:	Asphalt, Concrete, Road sub-base, Rock and Gravels, no soil.	
	Volume/amount:	80 m^3	
Application status:	☒ Accept ☐ Reject ☐ Further information required		
Acceptance location:	☒ Wainuiomata Cleanfill ☐ Silverstream Landfill ☐ Old Wainuiomata Landfill		
Assessment comments:	**Characterised by:** Emails from Stephen Prebble (CCL), GHD DSI (June 2019).		
	Physical properties (spadable): Damp and Dry		
	Material to be managed as: Cleanfill		
Disposal instructions for applicant:	• The volume per load and timing is to be agreed in advance with the cleanfill operator. • This approval is subject to the cleanfill operator's visual inspection of the material for physical suitability to dispose. • A copy of this approval must accompany each load. • This approval: - *No fine material will be accepted as part of this application.* - only covers the material as characterised above. - is given on a case-by-case basis and cannot be considered as approval for any loads beyond the extent described in this acceptance form. • The applicant must establish an account in advance with: - Wainuiomata landfill Ltd (email: dimaccontractors@xtra.co.nz) for disposal to Old Wainuiomata landfill or Wainuiomata Cleanfill.		
Prepared by:	Michelle van Niekerk, Tonkin + Taylor	Date: 08/10/2020	
Reviewed by:	Chris Hillman, Tonkin + Taylor	Date: 09/10/2020	

Cleanfill Acceptance Evaluation

Applicant:	**Organisation**:	Engeo	
	Contact name:	Roz Cox	
	Phone number:	[redacted]	
	Email:	[redacted]	
Application date:	08 October 2020	**Application number:**	0032
Material:	**Source:**	1 Whitmore Street, Wellington	
	Check of Selected Land Use Register	Completed	
	Description of material:	Piling Soil	
	Volume/amount:	740 m^3	
Application status:	☒ Accept ☐ Reject ☐ Further information required		
Acceptance location:	☒ Wainuiomata Cleanfill ☐ Silverstream Landfill ☐ Old Wainuiomata Landfill		
Assessment comments:	**Characterised by:** Engeo – Piling material between 5-50m depth		
	Physical properties (spadable): Dry		
	Material to be managed as: Cleanfill		
Disposal instructions for applicant:	• The volume per load and timing is to be agreed in advance with the cleanfill operator. • This approval is subject to the cleanfill operator's visual inspection of the material for physical suitability to dispose. • A copy of this approval must accompany each load. • This approval: - ***No material with a hydrocarbon smell will be accepted as part of this application.*** - only covers the material as characterised above. - is given on a case-by-case basis and cannot be considered as approval for any loads beyond the extent described in this acceptance form. • The applicant must establish an account in advance with: - Wainuiomata landfill Ltd (email: dimaccontractors@xtra.co.nz) for disposal to Old Wainuiomata landfill or Wainuiomata Cleanfill.		
Prepared by:	Michelle van Niekerk, Tonkin + Taylor	Date: 09/10/2020	
Reviewed by:	Chris Hillman, Tonkin + Taylor	Date: 09/10/2020	

Cleanfill Acceptance Evaluation

Applicant:	**Organisation**:	JLP Commercial Ltd	
	Contact name:	Karen Ackland	
	Phone number:	[redacted]	
	Email:	[redacted]	
Application date:	08 October 2020	**Application number:**	0033
Material:	**Source:**	Queensgate, Bloomfield Terrace, Lower Hutt	
	Check of Selected Land Use Register	Completed	
	Description of material:	Clay, some drainage gravel, some concrete from the surface of the site. Clay/drainage material advised to be from ~1.5m below ground level.	
	Volume/amount:	12 m^3	
Application status:	☒ Accept ☐ Reject ☐ Further information required		
Acceptance location:	☒ Wainuiomata Cleanfill ☐ Silverstream Landfill ☐ Old Wainuiomata Landfill		
Assessment comments:	**Characterised by:** ENGEO report (combined preliminary/Detailed Site Investigation Queensgate Zone D, 30/11/2018), located 15-20m from corner of Waterloo/Bloomfield Tce, assessed based on results from natural material in TP3, TP4, TP6.		
	Physical properties (spadable): Damp/dry		
	Material to be managed as: Cleanfill		
Disposal instructions for applicant:	• This approval is subject to the cleanfill operator's visual inspection of the material for physical suitability to dispose. • A copy of this approval must accompany each load. • This approval: - only covers the material and volume as characterised above (any additional material will require a separate application). • The applicant must establish an account in advance with: - Wainuiomata landfill Ltd (email: dimaccontractors@xtra.co.nz) for disposal to Old Wainuiomata landfill or Wainuiomata Cleanfill.		
Prepared by:	Andrea Tuohy, Tonkin + Taylor	Date: 13/10/2020	
Reviewed by:	Michael Stiff, Tonkin + Taylor	Date: 13/10/2020	

Cleanfill Acceptance Evaluation

Applicant:	**Organisation**:	Bullocks Contracting	
	Contact name:	Glenn Bullock	
	Phone number:	[redacted]	
	Email:	[redacted]	
Application date:	20 August 2020	**Application number:**	0025
Material:	**Source:**	Virgin excavated material with possible sorted pipe trench bedding material represented by sample TP5.E.400. Soil must not come from area characterised by sample TP6.E or contain any fill material.	
	Check of Selected Land Use Register	Completed	
	Description of material:	Natural ground – Alluvium material, Pipe trench bedding material (gravels).	
	Volume/amount:	400 m^3	
Application status:	☒ Accept ☐ Reject ☐ Further information required		
Acceptance location:	☒ Wainuiomata Cleanfill ☐ Silverstream Landfill ☐ Old Wainuiomata Landfill		
Assessment comments:	**Characterised by:** Emails from Dave Bull and Lab results sent 20th and 21st August 2020.		
	Physical properties (spadable): Dry		
	Material to be managed as: Cleanfill		
Disposal instructions for applicant:	• The volume per load and timing is to be agreed in advance with the cleanfill/landfill operator. • This approval is subject to the cleanfill/landfill operator's visual inspection of the material for physical suitability to dispose. • A copy of this approval must accompany each load. • This approval: - only covers the material as characterised above. - is given on a case-by-case basis and cannot be considered as approval for any loads beyond the extent described in this acceptance form. • The applicant must establish an account in advance with: - Dimac Contractors Ltd (dimaccontractors@xtra.co.nz) for disposal to Old Wainuiomata landfill or Wainuiomata Cleanfill.		
Prepared by:	Michael Stiff, Tonkin + Taylor	Date: 21/08/2020	
Reviewed by:	Chris Hillman, Tonkin + Taylor	Date: 21/8/20	

Cleanfill Acceptance Evaluation

Applicant:	**Organisation**:	PCL Contracting	
	Contact name:	Callum Buchanan	
	Phone number:	[redacted]	
	Email:	[redacted]	
Application date:	25 November 2020	**Application number:**	0035
Material:	**Source:**	11-19 Cuba street, Petone	
	Check of Selected Land Use Register	Completed	
	Description of material:	Natural sands	
	Volume/amount:	200m^3	
Application status:	☒ Accept ☐ Reject ☐ Further information required		
Acceptance location:	☒ Wainuiomata Cleanfill ☐ Silverstream Landfill ☐ Old Wainuiomata Landfill		
Assessment comments:	**Characterised by:** Email dated 25/11/2020 and Analytica lab reference number 20-44514		
	Physical properties (spadable): Damp/dry		
	Material to be managed as: Cleanfill		
Disposal instructions for applicant:	• This approval is subject to the cleanfill operator's visual inspection of the material for physical suitability to dispose. • A copy of this approval must accompany each load. • This approval: - only covers the material and volume as characterised above (any additional material will require a separate application). • The applicant must establish an account in advance with: - Wainuiomata landfill Ltd (email: dimaccontractors@xtra.co.nz) for disposal to Old Wainuiomata landfill or Wainuiomata Cleanfill.		
Prepared by:	Michael Stiff, Tonkin + Taylor	Date: 26/11/2020	
Reviewed by:	Chris Hillman, Tonkin + Taylor	Date: 26/11/20	

Euan Kyle

From: Michelle Van Niekerk <MVanNiekerk@tonkintaylor.co.nz>
Sent: Thursday, 24 September 2020 9:42 AM
To: 'cmtransportltd@outlook.com'
Cc: 'dimaccontractors@xtra.co.nz'; James Blair
Subject: Macaulay's Seaview - soil test results
Attachments: RTA-FORM-003 Applic Disposal of Special hazardous waste v2.pdf

Good day Raewyn,

Hope you are well.

Having reviewed the results received yesterday afternoon the material will not be accepted as cleanfill material, and therefore cannot be disposed at Wainuiomata Cleanfill.

If you would like to dispose the contaminated soil at Silverstream landfill as special waste, kindly complete and return the attached special waste application form.

Feel free to contact me if you have any questions.

Ngā Mihi | Kind regards,
Michelle van Niekerk | Civil Engineer
BTech Civil: Environmental
Tonkin + Taylor - *Exceptional thinking together*
Level 4, 2 Hunter Street, Wellington 6011 | PO Box 2083, Wellington, New Zealand
T +6448064947 www.tonkintaylor.co.nz T+T profile

Tonkin+Taylor

To send me large files you can use my **file drop**

HUTT CITY COUNCIL
SILVERSTREAM LANDFILL
APPLICATION FOR DISPOSAL OF SPECIAL/HAZARDOUS WASTE

Conditions for the Acceptance of Special/Hazardous Wastes at Silverstream Landfill

1. This form is for wastes having characteristics as described in Table H; or of a waste type listed in Table YA; or containing constituents listed in Table YB (tables attached).
2. Customer / Generator to complete this application as fully as possible and send to the HCC Solid Waste Consultant Tonkin & Taylor (T&T) on fax (04) 381-2908 or email well@tonkin.co.nz. For any queries please phone (04) 381-8560.
3. T&T will determine the acceptability of the waste or adequacy of the information provided. T&T will advise the customer/generator if additional analytical testing or other data are needed.
4. T&T will send notification of approval. A copy of the approval must accompany each load to the landfill.
5. After approval, contact Silverstream Landfill Manager (04) 563-6952, giving 24 hours notice of proposed delivery. Loads will only be accepted dependent on weather conditions.
6. Random sampling and analysis of wastes may be carried out to ensure compliance with the HCC Landfill Waste Disposal Guide.
7. Should a generator, waste disposal contractor or transporter fail to comply with this notice then special/hazardous wastes may no longer be accepted for disposal from that person or company.
8. Any person discharging or depositing undeclared hazardous waste into or onto a landfill may be prosecuted.

HUTT CITY COUNCIL
APPLICATION FOR DISPOSAL OF SPECIAL/HAZARDOUS WASTE

1. GENERATOR INFORMATION

Application No._____

1.1 Generator's Name:_____

1.2 Contact Person:_____

1.3 Business Address:_____

1.4 Phone:_____ Fax:_____

1.5 After-hours phone: _____

2. WASTE INFORMATION

2.1 Description of the waste:_____

_____

2.2 Location where waste generated:_____

2.3 Current storage location:_____

2.4 Process involved in generating the waste:_____

2.5 Batch number/date waste generated:_____

2.6 Is this waste treated hazardous waste? YES/NO

If YES:

2.6.1 Describe the waste and waste generation process prior to treatment:

_____

2.6.2 Describe the treatment the waste has undergone:_____

_____

2.7 Safety and handling instructions for this waste:_____

2.8 Estimated quantity (litres or kg):_____

2.9 Packaging method:_____

3. WASTE PROPERTIES

3.1 Physical characteristics of the waste (e.g. solid, powder, sludge, etc.):

_____

3.2 Is the waste **odorous**? YES/NO

3.3 Does the waste exhibit any of the **characteristics** listed in attached Table H? YES/NO
If YES, specify which ones:_____

3.4 Is the **waste type** listed in attached Table YA? YES/NO
If YES, specify which type:_____

3.5 Does the waste contain any of the **constituents** listed in attached Table YB? YES/NO
If YES, specify which ones:_____

3.5.1 What are the concentrations of these constituents (e.g., %, mg/kg)?

_____

3.6 Attach supporting documents such as analytical certificates, TCLP test results, MSDS, etc.

4. CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge. No deliberate or wilful omissions of waste composition, properties or quantities exist and all known or suspected hazards have been disclosed.

Signature: _____ Date: _____

Name: _____

Position: _____

TABLE H: LIST OF HAZARDOUS CHARACTERISTICS

UN Class*	Code	Characteristics
1	H1	Explosives An explosive substance or waste is a solid or liquid substance or waste (or mixture of substances or wastes) which is in itself capable by chemical reaction of producing gas at such a temperature and pressure and at such a speed as to cause damage to the surroundings.
3	H3	Flammable Liquids The word "flammable" has the same meaning as "inflammable". Flammable liquids are liquids, or mixtures of liquids, or liquids containing solids in solution or suspension (for example, paints, varnishes, lacquers, etc, but not including substances or wastes otherwise classified on account of their dangerous characteristics) which give off a flammable vapour at temperatures of not more than 61 deg. C.
4.1	H4.1	Flammable Solids Solids, or waste solids, other than those classed as explosives, which under conditions encountered in transport are readily combustible, or may cause or contribute to fire through friction.
4.2	H4.2	Substances or Wastes Liable to Spontaneous Combustion Substances or wastes which are liable to spontaneous heating under normal conditions encountered in transport, or to heating up on contact with air, and being then liable to catch fire.
4.3	H4.3	Substances or Wastes which, in Contact with Water, Emit Flammable Gases
5.1	H5.1	Substances or wastes which, by interaction with water, are liable to become spontaneously flammable or to give off flammable gases in dangerous quantities.
5.1	H5.1	Oxidizing Substances Substances or wastes, which while in themselves not necessarily combustible, may, generally by yielding oxygen cause, or contribute to, the combustion of other materials.
5.2	H5.2	Organic Peroxides Organic substances or wastes which contain the bivalent-o-o-structure are thermally unstable substances which may undergo exothermic self-accelerating decomposition.
6.1	H6.1	Poisonous Substances Substances or wastes liable either to cause death or serious injury or to harm human health if swallowed or inhaled or by skin contact.
6.2	H6.2	Infectious Substances Substances or wastes containing viable micro organisms or their toxins which are known or suspected to cause disease in animals or humans.
7	H7	Radioactive Material Spontaneously emits radiation greater than background level. Includes alpha, beta, gamma, x-rays, neutrons, high energy electrons, protons, other atomic particles.
8	H8	Corrosives Substances or wastes which, by chemical action, will cause severe damage when in contact with living tissue, or, in the case of leakage, will materially damage, or even destroy, other goods or the means of transport; they may also cause other hazards.
9	H10	Liberation of Toxic Gases in Contact with Air or Water Substances or wastes which, by interaction with air or water, are liable to give off toxic gases in dangerous quantities.
9	H11	Toxic (Delayed or Chronic) Substances or wastes, which, if they are inhaled or ingested or if they penetrate the skin, may involve delayed or chronic effects, including carcinogenicity. See note.
9	H12	Exotoxic Substances or wastes which if released, present or may present, immediate or delayed adverse impacts to the environment by means of bioaccumulation and/or toxic effects upon biotic systems. See note
9	H13	Capable, by any means, after disposal, of yielding another material, eg leachate, which possesses any of the characteristics listed above.

*Corresponds to the hazard classification system included in the United Nations Recommendations on the Transport of Dangerous Goods (ST/SG/AC 10/1/Rev.6, United Nations, New York, 1989)

TABLE YA: HAZARDOUS WASTE TYPES

WASTE TYPES		LIKELY SOURCES
Y1	Clinical wastes	Hospitals, public and private, medical clinics, emergency clinics, day hospitals, veterinary clinics, medical schools, mortuaries
Y2	Pharmaceutical production	Manufacture and formulation of pharmaceutical products. Chemist shops and related formulators
Y3	Redundant drugs and medicines	As for Y1 and Y2 (hospitals, clinics, rest homes).
Y4	Waste biocides and phytopharmaceuticals	Manufacture of herbicides, weedkilllers; insecticides and plant growth regulators; warehouses, stock and station agents and suppliers of these materials; Commercial users and applicators
Y5	Wood preserving chemicals	Formulators and suppliers of copper, chromium and arsenic, and other permanent wood treatment agents, derivatives of pentachlorophenol, quinolates and other antisapstain agents, and other wood preserving or non decorative protecting materials.
Y6	Organic solvents	Manufacturers and users, most organic chemical manufacturers, formulators and commercial users. Paint, ink, resins, etc.
Y7	Heat treatment cyanides	Metallurgical industries with special heat treatment facilities. Spring makers, etc
Y8	Waste mineral oils	Motor vehicle and other engine workshops Bus depots and bases for machinery contractors Waste oil collecting bases and re-refining activities
Y9	Waste oil, hydrocarbon, water mixtures and emulsions	Port facilities for bilge contents Sources for Y6 and Y8 above Cutting oils and wastes from metalworking operations Sumps and interceptor maintenance
Y10	PCBs, PCTs, PBBs	Waste substances or articles containing or contaminated with dielectric fluids in electrical equipment or hydraulic fluids. Manufacture of non-carbon copying paper
Y11	Tarry residues	Oil re-refining; carbonising processes; pyrolytic processes Distillation bottoms
Y12	Paints, inks, dyes, pigments,	Inks, including printing operations Lacquers, varnish, etc. dyes formulation and use Paint pigment, lacquers or varnish formulation and manufacture
Y13	Resins, glues, adhesives, latex, plasticisers, etc	Plastic product manufacturers Chemical manufacturers Plastic boat/pool fabricators
Y14	Waste chemical substances	Universities, polytechnics, secondary schools; hospital laboratories arising from research and research centres, development or teaching activities
Y15	Explosive wastes	Quarry operations, contractors. Processes using organic peroxides and other highly reactive materials
Y16	Photographic chemicals	Chemical manufacturers/supplies; film and processing materials production/laboratories Film processors
Y17	Surface treatment of metals and plastics	Galvanising, anodising, powder coating. Other surface treatment and processes
Y18	Residues from industrial waste disposal operations	On site and off site treatment processes
Y46	Wastes collected from households	
Y47	Residues arising from the incineration of household wastes	

TABLE YB: HAZARDOUS CONSTITUENTS

Code	Constituent
Y19	Metal carbonyls
Y20	Beryllium; beryllium compounds
Y21	Hexavalent chromium compounds
Y22	Copper compounds
Y23	Zinc compounds
Y24	Arsenic; arsenic compounds
Y25	Selenium; selenium compounds
Y26	Cadmium; cadmium compounds
Y27	Antimony; antimony compounds
Y28	Tellurium; tellurium compounds
Y29	Mercury; mercury compounds
Y30	Thallium; thallium compounds
Y31	Lead; lead compounds
Y32	Inorganic fluoride compounds
Y33	Inorganic cyanides
Y34	Acids
Y35	Bases
Y36	Asbestos (dust and fibres)
Y37	Organic phosphorus compounds
Y38	Organic cyanides
Y39	Phenols, phenol compounds including chlorophenols
Y40	Ethers
Y41	Halogenated organic solvents
Y42	Other organic solvents
Y43-44	Polychlorintaed dibenzo furans or dioxins
Y45	Other organohalogen compounds
Y48	Radioactive substances
Y49	Contained gases
Y50	Contaminated soils from remediated sites

From: Euan Kyle
To: [redacted]
Subject: RE: Response to Official Information Act request regarding Waiuiomata CLosed Landfill
Date: Thursday, 21 January 2021 3:58:23 PM
Attachments: 2020-09 CLT briefing - Cleanfill discussion paper.docx
Cleanfill discussion document - for HCC review.docx
Cleanfill discussion document - for review.pdf
Cleanfill discussion document - November 2020.docx
Cleanfill discussion document - September 2020.pdf
Cleanfill long-term planning - Discussion document.pdf
Cleanfill long-term planning - Updated discussion document.pdf
CLG Agenda 2 - June 2020.docx
Draft minutes from CLG meeting - for your review.pdf
Export_Output_2.csv
RE Cleanfill discussion document - for HCC review - JS.PDF
RE Cleanfill discussion document - for review.pdf
RE Report on Breaches at the Wainuiomata Cleanfill 1.pdf
Re Report on Breaches at the Wainuiomata Cleanfill.pdf
Search for alternative sites - cleanfilling.docx
Suitable_Sites_For_Cleanfilling_Edits.pdf
Summary of long-term planning - is that what Dave was after.pdf
Updated Cleanfill Report - future demand (for HCC review).asd.docx
image001.jpg
image002.jpg
image003.jpg
hccsmalllogo_12fb0640-f486-4c5a-a775-f4ab1b1dfb5d.jpg
12153HaHEmailSignatureFINAL_3cd6181d-2156-4dde-9fbd-b6f7f302ed05.JPG
13139RubbishandRecyclingEngagementEMAIL_5ddea2b0-952f-4aed-8ca4-d26306e488b2.jpg

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21/01/2021

[redacted]

Dear [redacted]

Request for Information – Local Government Official Information and Meetings Act 1987

We refer to your official information request regarding Wainuiomata Closed Landfill.

Please find the information regarding question 4 attached.

4. Please supply all emails and all correspondence between Dave Dews and Alastair Meehan that pertain to Cleanfill sites for the period 01 Jan and 01 Dec 2020

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Yours sincerely,

Euan Kyle
Senior Advisor, Official Information and Privacy

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand
T 04 570 6702 W www.huttcity.govt.nz

BRIEFING

To: **CLT**

From: **Dave Dews, Solid Waste Manager**

via **…**

Date: **23 September 2020**

SUBJECT: **CLEANFILL DISCUSSION PAPER**

Purpose

To provide you with information relating to cleanfill operations and seek a decision regarding the long-term provision of such a facility following closure of the current site in Wainuiomata.

Background

Please refer to the attached discussion document.

Decisions sought

Does HCC wish to continue providing a cleanfill and waste recovery facility once the existing facility in Wainuiomata is closed?

□ **Yes**

□ **No**

If so, is HCC comfortable commencing with a site identification and selection process as outlined in Section 4 of the attached discussion document?

□ **Yes**

□ **No**

REPORT

Tonkin+Taylor

Hutt City's cleanfill demand and future site analysis

Discussion Paper

Prepared for
Hutt City Council
Prepared by
Tonkin & Taylor Ltd
Date
September 2020
Job Number
84466.006.v1

Exceptional thinking together
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Document Control

Title: Hutt City's cleanfill demand and future site analysis					
Date	**Version**	**Description**	**Prepared by:**	**Reviewed by:**	**Authorised by:**
September 2020	1.0	Draft report for HCC review	A Meehan	C Purchas	E Breese

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Hutt City Council	1 PDF copy
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1 Introduction

1.1 Purpose of this report

The Wainuiomata Cleanfill is the only active remaining cleanfill facility within Hutt City's administrative boundaries and therefore plays a key role among Hutt City Council's (HCC) waste assets. It also plays a vital role in the economic development of the City. Operations at this site must cease by 19 June 2022 and a decision is required about whether HCC wishes to continue providing this service at another site.

In making this decision, consideration should be given to HCC's lead role in the minimisation of waste generation in the City, and the symbiotic relationship between an operational cleanfill and the re-use and recycling of certain waste materials. This report has therefore been prepared to support HCC's Corporate Leadership Team (CLT) in making a decision about the long-term desirability of providing such a facility and how it aligns with Council's wider objectives.

This report has been prepared in accordance with Tonkin & Taylor Ltd's (T+T) letter of engagement dated 6 July 2020 and with our current contract for services dated 30 August 2006.

1.2 What is a cleanfill?

The Ministry for the Environment (MfE) defines cleanfills as "*a low-cost alternative to landfills for inert waste that will have no potentially adverse environmental effect, or only minor effects*". They form an important part of the waste asset hierarchy, and are sometimes referred to as Class 4 landfills, per the technical guidance issued by WasteMINZ[1] and summarised below:

- Class 1 landfill: Municipal solid waste landfills and most industrial waste landfills.
- Class 2 landfill: Construction and demolition landfills and some industrial waste landfills.
- Class 3 landfill: Managed or controlled fills (which accept cleanfill and some contaminated materials).
- Class 4 landfill: Cleanfills.
- Closed landfill: A landfill that no longer accepts material for disposal.

Cleanfills are subject to stringent waste acceptance criteria. Accordingly the material deposited into a cleanfill typically comprises inert construction and demolition (C&D) materials (i.e. soil, rock, concrete, bricks and similar material) that will not break down when disposed to ground. These limitations prevent many materials being disposed of at a cleanfill, including:

- Contaminated soil;
- Contaminated C&D waste (e.g. asbestos);
- Non-inert C&D waste (e.g. timber and plasterboard);
- Household waste; and
- Garden waste.

This enables operators to accept material without the need for the construction of expensive liners, leachate collection systems, gas collection systems, the collection of waste levies or the associated level of environmental monitoring. In turn, this provides a cost-effective facility for contractors to dispose of suitable material, thereby keeping the cost of development down[2] while also preserving

[1] Draft WasteMINZ Technical Guidelines for the Disposal of Residual Waste and other Material (Land Disposal Technical Guidelines) dated June 2013

[2] For comparison, the Wainuiomata Cleanfill currently charges contractors $12 / cubic metre to dispose cleanfill while the rate for disposing general waste at the Silverstream Landfill is $ $126.50 / tonne (incl. GST).

airspace within higher class landfills around the region. This extends the operational life of these regionally significant pieces of infrastructure (including the Silverstream Landfill).

1.3 Demand for cleanfill deposition facilities

Development within the Hutt Valley generates substantial volumes of cleanfill material. In the past 4 months alone (May – August 2020) contractors have paid to deposit approximately 35,000 m^3 of loose cleanfill material into the Wainuiomata facility. While the exact volumes vary, the operator estimates that approximately 50% of material disposed of at the Wainuiomata Cleanfill is generated within Wainuiomata, while the majority of the remaining material is generated within the Hutt Valley (including Upper and Lower Hutt). While there is nothing preventing material from further afield (i.e. greater Wellington or the Wairarapa) being accepted, there are commercial incentives for contractors to reduce haulage distances and associated costs. This material originates from construction projects, including:

- The Queensgate Mall redevelopment.
- The Palliser Hotel redevelopment.
- Wainuiomata Mall redevelopment.
- Various residential developments across the city.
- Ongoing roading maintenance activities across the city (for example slip remediation along Coast Road).

HCC is faced with numerous infrastructure projects in the coming years that could generate and therefore require a facility to dispose of cleanfill. This includes the Eastern Bays cycleway, Naenae Pool redevelopment, Three Waters network renewals and ongoing road maintenance.

In addition to the pipeline of infrastructure projects HCC is faced with growing demand for residential development. It the first three quarters of the 2020/21 financial year HCC had received 1287 building consents with a combined value of $377.7 million – a 49% increase from the previous period. Many of these developments can be reasonably expected to require the ability to dispose of material associated with the site preparation works. The availability of cost-effective deposition facilities to support these developments directly impacts their costs and associated viability, and when the existing Wainuiomata Cleanfill temporarily closed in early-2020 feedback was received from several developers that the increased cost of having to go to Wellington affected the viability of their projects. This preliminary analysis would indicate that demand for cleanfill facilities is expected to continue for the foreseeable future, and the ongoing provision of a suitable cleanfill facility will be required to facilitate this development.

1.4 HCC's existing cleanfill

HCC currently own a cleanfill facility at 130 Coast Road in Wainuiomata, which is operated under contract by Wainui Cleanfill Ltd. A location plan showing the location of this site is providing in Figure 1 below.

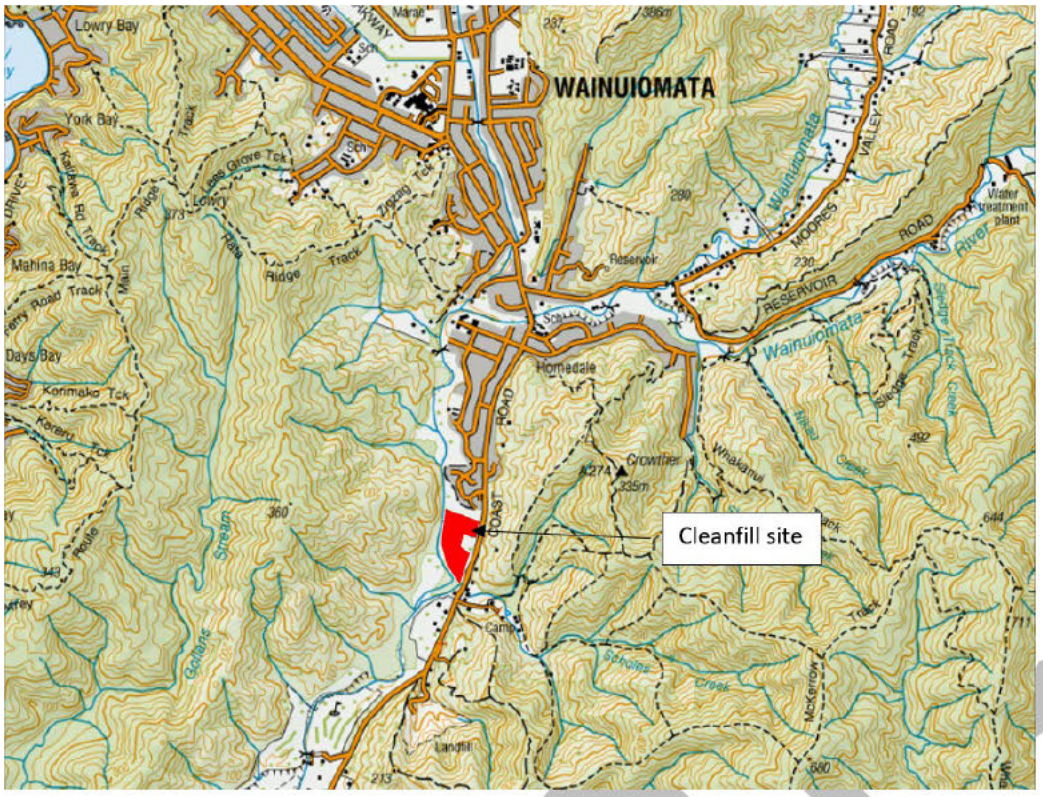

Figure 1: Existing cleanfill site located at 130 Coast Road

The site has an area of approximately 6ha and receives cleanfill material from approved commercial operators across the district (and wider region). It is the only remaining operating cleanfill within the city boundaries and one of only four remaining consented cleanfills within the Wellington Region[3]. We do note that a site in Upper Hutt (at St Pats Silverstream) is being touted for future use as a cleanfill, however no decision has yet been made authorising this use and it is already garnering opposition from local community groups.

The material deposited at Wainuiomata is a by-product of development and supports developers in delivering development projects (including residential development, roading maintenance and other infrastructure upgrades). Approximately 165,000 m^3 of cleanfill has previously been deposited into the site, with a further 117,000 m^3 authorised under the existing resource consent.

1.5 History of the Wainuiomata Cleanfill

HCC has been providing a cleanfill facility since 2011 when the facility in Wainuiomata first commenced operating.

HCC initially considered that it could successfully operate the cleanfill site itself by dealing with only a limited number of large contractors with whom HCC had existing relationships. It initially estimated that a 6-year period would be sufficient to fill the site. The rate of filling however was slower than expected and by 2017 the site was only partially full. HCC therefore sought to extend the operational life of the cleanfill facility along with an operational decision to contract the operation of the cleanfill to an independent contractor – Wainui Cleanfill Ltd. In conjunction with significant growth and associated levels of development in Hutt City, this decision has ultimately resulted in a steady increase in filling rates. That increased volume has allowed ongoing

[3] The other being the C&D Landfill, T&T Landfill in Wellington City and Waiu Street in Wainuiomata (currently closed). Small scale cleanfills may operate under permitted activity rules in the relevant Regional Plan, however these involve a maximum fill volume of 400 m^3 of material and therefore are unsuited to commercial operation.

improvements to be made on site, including permanent staff on site to enable real time supervision of deliveries to site, improved roading within the site, and installation of a wheel wash. HCC's operational staff consider that this partnership with the site operator along with the site improvements have resulted in an operation that is well-managed and appropriately mitigates the potential for adverse effects while delivering an important asset for HCC and the wider region.

1.6 Environmental impacts of a cleanfill

Cleanfills are required to manage their associated environmental effects under the district and regional planning framework. Under this framework any commercial cleanfill within the HCC administrative boundaries will require resource consent from both HCC and GWRC to operate. This could reasonably be expected to involve the imposition of consent conditions imposing the following type of controls:

- Site operating procedures that can reliably control the material being disposed of (thereby ensuring that only appropriate cleanfill material is accepted);
- Controls to manage the potential for adverse impacts upon water quality (e.g. stormwater controls, soakage pits, perimeter bunding and site stabilisation);
- Controls to manage the discharge of dust (e.g. speed limits, sealing access roads and retaining water sources onsite);
- Controls to manage noise, traffic and the tracking of material onto any nearby roads (e.g. vehicle washes, noise limits and associated monitoring and transportation assessments); and
- Plans to stabilise and remediate the site following completion.

The Wainuiomata Cleanfill is subject to similar such consent conditions and has been subject to regular inspections and site audits since 2011. The site has generally demonstrated a high degree of compliance with consent conditions with complaints or observed non-compliances addressed by the operator (e.g. material tracking onto the road and dust generation). This demonstrates that cleanfill operations, when competently managed, can appropriately mitigate their associated adverse effects while delivering the wider benefits identified above.

1.7 Financial impacts of a cleanfill

The Wainuiomata Cleanfill currently provides HCC with a gross revenue of approximately $400,000 - $500,000 per year. Importantly however, the cleanfill provides wider financial benefits to council in the following ways:

1. Provides a low-cost deposition facility which minimises cost incurred by HCC's operational teams (e.g. roading maintenance contracts).
2. Provision of a low cost and proximate cleanfill facility reduces the propensity for fly-tipping of inert materials that HCC would otherwise pay to uplift and dispose of.
3. Reduces the volume of material otherwise requiring disposal at Silverstream Landfill. This preserves available airspace in the active waste cell(s) for general waste, which requires stringent environmental controls and is subsequently charged a higher disposal fee.

2 HCC's existing waste commitments

HCC is committed to several waste-related initiatives which are outlined below. The continued provision of a cleanfill(s) within HCC's administrative boundaries is considered to align with these commitments for the reasons identified below.

2.1 Wellington Region's Waste Management and Minimisation Plan

The Wellington Regional Waste Management and Minimisation Plan 2017 – 2023 is a joint plan prepared for all territorial authorities in the Wellington Region under the Waste Minimisation Act 2008. The purpose of this plan is to set the strategic priorities and frameworks for managing waste within the region, with a key objective to reduce the amount of waste being disposed of in Class 1 landfills from 600 kg per person per annum to 400 kg per person per annum by 2026.

To achieve this the Waste Management and Minimisation Plan sets a number of objectives, including:

1. To reduce the total quantity of waste to landfill, with an emphasis on wastes that create the most human and environmental harm.
2. To provide environmental, social, economic and cultural benefits by increasing the amount of waste diverted from landfill via reuse, recovery and/or recycling.
3. To investigate the use of available recovery and treatment technologies and service methodologies and apply these where appropriate.
4. To investigate and where appropriate develop partnerships, joint working and co-operation across the private and community sectors as well as territorial and regional councils, including shared services.
5. To work with service providers to identify efficiencies while maintaining or improving service levels.
6. To consider both short and long-term cost impacts of all actions across the community including economic costs and benefits.
7. To consider the environmental impacts of all options and ensure the overall environmental impact is taken into account in decision making.

The provision of a viable cleanfill(s) within a region is considered to either directly or indirectly support those objectives by:

1. Directly reducing the volumes of waste material that would otherwise be disposed to landfill or unauthorised tip sites.
2. Supporting the future provision of a resource recovery facility (as discussed in Section 4 below).
3. Providing a cost-effective facility for service providers (including property developers, infrastructure providers and maintenance contractors) to dispose of suitable inert material and thereby reduce development costs.
4. Extending the life of the region's other landfills (including Silverstream) by diverting suitable material from those sites.

2.2 Regional Policy Statement for the Wellington Region

The Regional Policy Statement (RPS) sets a specific objective (Objective 11) and policy (Policy 65) promoting the reduction of waste going to landfills. Objective 11 states that the *quantity of waste disposed of is reduced* while Policy 65 promotes the reduction, reuse, and recycling of waste.

Cleanfills are specifically identified as one method of diverting otherwise clean and inert material from the waste-stream to assist with achieving this objective and policy.

2.3 HCC's Environmental Sustainability Strategy 2015 - 2045

HCC's Environmental Sustainability Strategy sets a vision for *a thriving environment, now and into the future* and identifies a series of goals to achieve this. One of these goals is for HCC to demonstrate leadership in environmental stewardship and sustainability, with one measure of success being that *council manages waste activities to best practice to maximise recycling and diversion from landfill*.

Cleanfills are recognised across NZ as a best practice approach to diverting otherwise non recoverable inert material from Class 1-3 landfills. The provision of a cleanfill(s) will continue to be required to complement any future provision of a resource recycling and recovery facility (as outlined in Section 4 of this report).

2.4 HCC's Infrastructure Strategy 2018 - 2048

HCC's Infrastructure Strategy sets a vision for *infrastructure that meets the needs of today and tomorrow*. This vision is underpinned by a series of goals relating to improved resilience and capacity of existing networks and recognises several key infrastructure related projects including three water network renewals, road network improvement works, shared path and cycleway developments. This is in addition to those works recently announced as part of the Government's shovel ready programme of works. Infrastructure projects have the potential to generate cleanfill material requiring disposal and have historically been the source of substantial volumes of spoil material disposed of into the Wainuiomata facility (e.g. the Wainuiomata Shared Path and works upon the roading network).

This strategy recognises that the substantial capital and operational expenditures associated with the development, upgrade and maintenance of infrastructure represents a key constraint to the delivery of these projects. The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments.

2.5 HCC's Urban Growth Strategy 2012 – 2032

HCC's Urban Growth Strategy sets out the long-term approach to managing growth and change for Hutt City. This strategy identifies that much of the cost to HCC associated with the provision of new greenfield infrastructure will be associated with the development of new infrastructure. We also note that while land development costs for both brownfield and greenfield development will be borne by future developers, these will have a direct impact upon the cost of developing within the Hutt Valley (and therefore upon market costs).

The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments. It also incentivises developers to do business within the city by providing a cost-effective disposal facility.

3 Opportunities for further waste minimisation

Due to their low cost cleanfills have historically been viewed as a popular facility to divert materials away from landfills. While this remains a desirable outcome, we note that there is an increasing focus on the recovery of materials from C&D activities (e.g. demolition timber, reusable building materials, concrete and steel). This focus stems from the fact that C&D waste remains a high-volume waste stream within the Wellington Region.

A 2018 report prepared for the Wellington Regions *Waste Management and Minimisation Plan (WMMP) Working Group*[4] identified the creation of additional processing capability as having the highest potential to reduce the amount of material disposed of at landfills across the region. In Wainuiomata we know that some of the material currently disposed of (including concrete and topsoil) could be reused and recycled, if HCC had a facility that enabled it (see further discussion in Section 3.1 and 3.2 below). This directly supports the objectives of the Waste Management and Minimisation Plan (identified in Section 2.1 above) and HCC officers have expressed an interest in providing facilities to enable an enhanced level of material recovery within Hutt City. An overview of these type of facilities is provided below.

3.1 C&D waste resource recovery

As noted previously, the Regional Waste Minimisation and Management Plan working group have identified potential to actively target C&D waste for enhanced resource recovery. The group are considering further work to develop one or more resource recovery facilities in the region.

Council is also developing proposals for upgrading the transfer station at Silverstream Landfill including a new resource recovery area. This area is suitable for domestic and small commercial materials i.e. any resource recovery target C&D waste or other materials will need to take place elsewhere.

A typical C&D resource recovery operation may include:

- Separation of concrete and other suitable rubble for processing into 'recycled aggregate' (see Section 3.2).
- Separation and stockpiling of fill material and topsoil.
- Removal and processing of native timber (de-nailing, re-dressing)
- Removal of recyclable materials
  - Metals (components, piping, packaging) for recycling
  - Cardboard (clean, suitable for recycling)
  - Plastics (specific materials with viable markets)
  - Building components that are suitable for re-use
  - Flat glass - for crushing as aggregate/sand, or as feedstock for fibreglass manufacturing
- Separation of materials suitable for cleanfill
- Consolidation of remaining material for disposal at an appropriately consented Class 1 Landfill or Class 2 Managed Landfill.

An operation of this type in the Hutt Valley will require a suitable location with many of the location characteristics being similar to those for a cleanfill. Example characteristics include

- Good transport links
- Suitable zoning (industrial or commercial/rural)

[4] Titled *Regional C&D Waste Issues and Options Paper*, dated October 2018

- Supportive or involved landowner.

3.2 Concrete crushing and recycling

A reasonable volume of material disposed of to cleanfill and landfills within the Wellington Region includes concrete from demolition sites. HCC officers have identified an opportunity for Council to establish a facility that crushes and screens this concrete for use as aggregate on cycleways, driveways and other construction projects. This would provide a recovered source of construction material and reduce the waste diverted into landfill or cleanfills, while also supporting additional waste minimisation initiatives (i.e. supporting the introduction of contractual requirements relating to the use of recycled material in construction contracts tendered by HCC).

We consider that a facility for the crushing of concrete and subsequent resale as aggregate could feasibly complement operations at a future cleanfill – subject to identification of a site which can accommodate both activities. Should HCC choose to continue providing a cleanfill facility we expect this will form part of the site selection criteria.

3.3 Relationship of these facilities with cleanfill facility

We would encourage HCC to think of its waste assets as being strategically aligned with one another. These facilities do not operate completely independently, but rather as an interconnected group of assets that collectively serve its ratepayers and assist HCC in meeting its strategic objectives.

If HCC was to implement all of these specified waste minimisation measures (including the transfer station at Silverstream and C&D recovery operation) it would lead New Zealand in terms of its approach to waste minimisation. Even in this instance however it would be infeasible to recover, reuse or recycle all material that is currently disposed of as cleanfill. As such cleanfill deposition facilities will remain an important part of HCC's waste infrastructure – whether they are provided by HCC or private operators.

HCC's involvement in cleanfill operations also presents opportunities that would be infeasible for sites operated exclusively by a private operator. A cleanfill operated solely by a private operator will be primarily driven by commercial drivers - maximising disposal volumes while minimising operating expenditure. On the other hand a council-operated facility can target different outcomes by effectively working within, and supporting the wider waste 'ecosystem' (landfill, cleanfill and waste recovery). As an example, a council-run facility could incentivise resource recovery through pricing mechanisms that discourage cleanfill deposition where material recovery and recycling is available. This interrelationship between the different waste assets is an important consideration to keep in mind as part of the following discussion.

4 Identifying a future cleanfill site(s)

HCC officers expect that the existing Wainuiomata Cleanfill will cease operation no later than 19 June 2022. Should HCC determine that the continued provision of a cleanfill facility is desirable in the long-term we expect that a detailed site selection process would be required - including Multi-Criteria Analysis (MCA) and public consultation. This will assist HCC in meeting its obligations under both the Resource Management Act (RMA) and Local Government Act (LGA) – both of which require the consideration of alternatives in certain circumstances[5].

HCC officers expect there will be some sites within Lower Hutt that are suitable for cleanfill operations, however given the interest in this decision there is a strong desire not to be seen to presuppose any particular outcome. To ensure that this site identification and selection process remains as transparent and robust as possible we recommend the following three-stage process is followed.

4.1 Site identification and longlisting

The goal of the initial site selection process will be to identify an initial longlist of sites for further consideration. While ultimately this list will contain a high number of sites that will prove unsuitable, the aim will be to limit the likelihood that any potentially suitable site is excluded from initial consideration. To achieve this, we expect that HCC could identify the minimum criteria required to establish an operational cleanfill on site by June 2022. Proposed criteria include sites that:

- Are HCC owned;
- Have a minimum site size of 10,000 m^2; and
- Are located within HCC's administrative boundaries.

GIS analysis could then be used to populate this initial longlist, which would be used as the basis for further consideration of sites.

4.2 Site shortlisting

We acknowledge that many of the sites identified within the initial longlist will be unsuitable for the establishment of a cleanfill facility. This could be due to a number of disparate factors including:

- Without adequate vehicle access; or
- Located within residential or commercially zoned areas; or
- Subject to a statutory acknowledgement; or
- With a topographic profile unsuited to bulk filling; or
- Subject to specified District Plan or Regional Plan overlays (i.e. SNAs); or
- Located within reserve land or native forest; or
- Any other agreed criteria.

Refining these criteria would be undertaken in partnership with HCC officers and the site operator, and we expect that some of these criteria would represent fatal flaws. Any site exhibiting a fatal flaw would then be excluded from further consideration. Those sites which do not exhibit a fatal flaw could then be added to a shortlist of prospective sites. Once this shortlist is populated HCC would have the opportunity to consult with the community and seek its views on the respective sites.

[5] Part 6 of the LGA and Schedule 4 of the RMA.

4.3 Site selection process

Following receipt of community feedback on the shortlisted sites, HCC would then need to identify a preferred site(s). We expect the most robust mechanism for selecting a preferred site is via Multi-Criteria Analysis (MCA). This is a widely used tool that involves scoring different options on a range of aspects, attributes or criteria which are reflective of the issues that need to be considered to achieve the best outcome. These different criteria are then weighted, scores aggregated, and a preferred outcome, site or route is identified as a result.

The scoring criteria would need to be refined, however some example criteria could include:

- Neighbours (proximity, number and likely impact);
- Ease of access;
- Lot size and site capacity (both in terms of volume of cleanfill material and ability to cater to other recycling and reuse facilities);
- Fiscal cost to establish;
- Natural hazards;
- Opportunity costs associated with the site;
- Environmental effects (ecological, noise, visual etc);
- Impacts upon tangata whenua; and
- Proximity to source of material.

Scoring would typically involve a structured workshop with key stakeholders in attendance to discuss and score the various options against agreed criteria. Once a preferred site(s) is available HCC can then commence the necessary investigations and consenting processes to facilitate the commencement of operations.

5 Next steps

The purpose of this report was to provide HCC's CLT with information to support making a decision about whether HCC wish to continue providing such a facility. If HCC do wish to continue providing such a facility we expect the following next steps will be required:

1. Establish a longlist of prospective sites based upon agreed minimum criteria;
2. Undertake a fatal flaws analysis and establish a shortlist of sites based upon agreed site criteria;
3. Undertake community consultation, seeking community views of the shortlisted sites;
4. Undertake a Multi-Criteria Analysis (MCA) of the shortlisted sites to identify a preferred site(s);
5. Undertake site investigations to confirm suitability of the preferred site(s);
6. Prepare and obtain the necessary suite of resource consents to authorise operations;
7. Undertake any necessary site improvements (e.g. access road improvements, erosion and sediment controls etc); and
8. Commence cleanfill operations.

6 Applicability

This report has been prepared for the exclusive use of our client Hutt City Council, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

Tonkin & Taylor Ltd

Report prepared by:	Authorised for Tonkin & Taylor Ltd:
.....	.....
Alastair Meehan	Ed Breese
Planner	Project Director

Technically reviewed by Chris Purchas on 22 September 2020.

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Euan Kyle

From: Alastair Meehan
Sent: Wednesday, 23 September 2020 10:41 AM
To: Dave Dews
Cc: Ed Breese
Subject: Cleanfill discussion document - for review
Attachments: 2020-09 CLT briefing - Cleanfill discussion paper.docx; Cleanfill discussion document - for HCC review.docx

Morning Dave,

I've attached the draft discussion document and a CLT briefing memo. Both are ready for review as agreed last Monday. Let me know if you'd like any further changes.

I will finalise the discussion document (remove draft watermark, PDF and insert signatures) for presentation to CLT once you and Helen confirm you're happy.

Ngā Mihi | Kind regards,
Alastair Meehan | Planner

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REPORT

Tonkin+Taylor

Hutt City's cleanfill demand and future site analysis

Discussion Paper

Prepared for
Hutt City Council
Prepared by
Tonkin & Taylor Ltd
Date
September 2020
Job Number
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23 September 2020	1.0	Draft report for HCC review	A Meehan	C Purchas	E Breese
28 September 2020	2.0	Report for issue to HCC	A Meehan	C Purchas	E Breese

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This enables operators to accept material without the need for the construction of expensive liners, leachate collection systems, gas collection systems, the collection of waste levies or the associated level of environmental monitoring. In turn, this provides a cost-effective facility for contractors to dispose of suitable material, thereby keeping the cost of development down[2] while also preserving

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Material disposed at the cleanfill originates from construction projects, including:

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- The Palliser Hotel redevelopment.
- Wainuiomata Mall redevelopment.
- Various residential developments across the city.
- Ongoing roading maintenance activities across the city (for example slip remediation along Coast Road). Material classified as mud and slips accounted for approximately 500 m^3 between May – July 2020.

HCC is faced with numerous infrastructure projects in the coming years that could generate and therefore require a facility to dispose of cleanfill. This includes the Eastern Bays cycleway, Naenae Pool redevelopment, Three Waters network renewals and ongoing road maintenance.

In addition to the pipeline of infrastructure projects, HCC is faced with growing demand for residential development. In the first three quarters of the 2020/21 financial year, HCC had received 1,287 building consents with a combined value of $377.7 million – a 49% increase from the previous period. Many of these developments can be reasonably expected to require the ability to dispose of material associated with the site preparation works (predominantly from site scraping and the establishment of flat building platforms). The availability of cost-effective deposition facilities to support these developments directly impacts their costs and associated viability. Notably, when the existing Wainuiomata Cleanfill temporarily closed in early 2020, feedback was received from several developers that the increased cost of having to go to Wellington affected the viability of their projects. This preliminary analysis would indicate that demand for cleanfill facilities is expected to continue for the foreseeable future, and the ongoing provision of a suitable cleanfill facility will be required to facilitate this development.

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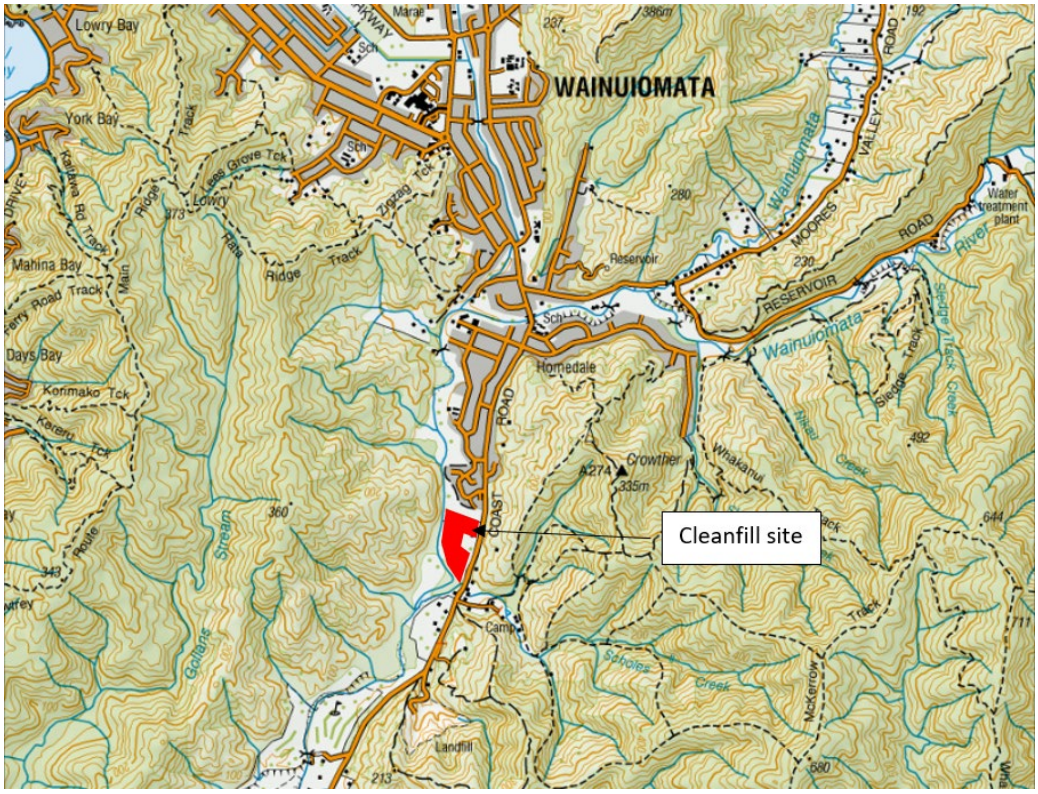

Figure 1: Existing cleanfill site located at 130 Coast Road

The site has an area of approximately 6ha and receives cleanfill material from approved commercial operators across the district (and wider region). It is the only remaining operating cleanfill within the city boundaries and one of only four remaining consented cleanfills within the Wellington Region[3]. We do note that a site in Upper Hutt (at St Patricks College, Silverstream) is being touted for future use as a cleanfill however no decision has yet been made authorising this use and it is already garnering opposition from local community groups.

The material deposited at Wainuiomata is a by-product of development and supports developers in delivering projects (including residential development, roading maintenance and other infrastructure upgrades). Approximately 165,000 m^3 of cleanfill has previously been deposited into the site, with a further 117,000 m^3 authorised under the existing resource consent.

1.5 History of the Wainuiomata Cleanfill

HCC has been providing a cleanfill facility since 2011 when the facility in Wainuiomata first began operating.

HCC initially considered that it could successfully operate the cleanfill site itself by dealing with only a limited number of large contractors with whom HCC had existing relationships. It initially estimated that a 6-year period would be sufficient to fill the site. The rate of filling however was slower than expected and by 2017 the site was only partially full. HCC therefore sought to extend the operational life of the cleanfill facility along with an operational decision to contract the operation of the cleanfill to an independent contractor – Wainui Cleanfill Ltd. In conjunction with significant growth and associated levels of development in Lower Hutt, this decision has ultimately resulted in a steady increase in filling rates. That increased volume has allowed ongoing

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improvements to be made on site, including permanent staff on site to enable real time supervision of deliveries to site, improved roading within the site and the installation of a wheel wash. HCC's operational staff consider that this partnership with the site operator along with the site improvements have resulted in an operation that is well-managed and appropriately mitigates the potential for adverse effects while delivering an important asset for HCC and the wider region.

1.6 Environmental impacts of a cleanfill

Cleanfills are required to manage their associated environmental effects under the district and regional planning framework. Under this framework, any commercial cleanfill within the HCC administrative boundaries will require resource consent from both HCC and GWRC to operate. This could reasonably be expected to involve the imposition of consent conditions imposing the following type of controls:

- Site operating procedures that can reliably control the material being disposed of (thereby ensuring that only appropriate cleanfill material is accepted);
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- Controls to manage the discharge of dust (e.g. speed limits, sealing access roads and retaining water sources onsite);
- Controls to manage noise, traffic and the tracking of material onto any nearby roads (e.g. vehicle washes, noise limits and associated monitoring and transportation assessments); and
- Plans to stabilise and remediate the site following completion.

The Wainuiomata Cleanfill is subject to similar such consent conditions and has been subject to regular inspections and site audits since 2011. The site has generally demonstrated a high degree of compliance with consent conditions with complaints or observed non-compliances addressed by the operator (e.g. material tracking onto the road and dust generation). This demonstrates that cleanfill operations, when competently managed, can appropriately mitigate their associated adverse effects while delivering the wider benefits identified above.

1.7 Financial impacts of a cleanfill

The Wainuiomata Cleanfill currently provides HCC with a gross revenue of approximately $400,000 - $500,000 per year. Importantly however, the cleanfill provides wider financial benefits to council in the following ways:

1. Provides a low-cost deposition facility which minimises cost incurred by HCC's operational teams (e.g. roading maintenance contracts).
2. Provision of a low cost and proximate cleanfill facility reduces the propensity for fly-tipping of inert materials that HCC would otherwise pay to uplift and dispose of.
3. Reduces the volume of material otherwise requiring disposal at Silverstream Landfill, thereby extending the life of Silverstream landfill. It preserves available airspace in the active waste cell(s) for general waste, which requires stringent environmental controls and is subsequently charged a higher disposal fee.

2 HCC's existing waste commitments

HCC is committed to several waste-related initiatives which are outlined below. The continued provision of a cleanfill(s) within HCC's administrative boundaries is considered to align with these commitments for the reasons identified below.

2.1 Wellington Region's Waste Management and Minimisation Plan

The Wellington Regional Waste Management and Minimisation Plan 2017 – 2023 is a joint plan prepared for all territorial authorities in the Wellington Region under the Waste Minimisation Act 2008. The purpose of this plan is to set the strategic priorities and frameworks for managing waste within the region, with a key objective to reduce the amount of waste being disposed of in Class 1 landfills from 600 kg per person per annum to 400 kg per person per annum by 2026.

To achieve this, the Waste Management and Minimisation Plan sets a number of objectives, including:

1. To reduce the total quantity of waste to landfill, with an emphasis on wastes that create the most human and environmental harm.
2. To provide environmental, social, economic and cultural benefits by increasing the amount of waste diverted from landfill via reuse, recovery and/or recycling.
3. To investigate the use of available recovery and treatment technologies and service methodologies and apply these where appropriate.
4. To investigate and where appropriate develop partnerships, joint working and co-operation across the private and community sectors as well as territorial and regional councils, including shared services.
5. To work with service providers to identify efficiencies while maintaining or improving service levels.
6. To consider both short and long-term cost impacts of all actions across the community including economic costs and benefits.
7. To consider the environmental impacts of all options and ensure the overall environmental impact is taken into account in decision making.

The provision of a viable cleanfill(s) within a region is considered to either directly or indirectly support those objectives by:

1. Directly reducing the volumes of waste material that would otherwise be disposed to landfill or unauthorised tip sites.
2. Supporting the future provision of a resource recovery facility (as discussed in Section 4 below).
3. Providing a cost-effective facility for service providers (including property developers, infrastructure providers and maintenance contractors) to dispose of suitable inert material and thereby reduce development costs.
4. Extending the life of the region's other landfills (including Silverstream) by diverting suitable material from those sites.

2.2 Regional Policy Statement for the Wellington Region

The Regional Policy Statement (RPS) sets a specific objective (Objective 11) and policy (Policy 65) promoting the reduction of waste going to landfills. Objective 11 states that the *quantity of waste disposed of is reduced* while Policy 65 promotes the reduction, reuse, and recycling of waste.

Cleanfills are specifically identified as one method of diverting otherwise clean and inert material from the waste-stream to assist with achieving this objective and policy.

2.3 HCC's Environmental Sustainability Strategy 2015 - 2045

HCC's Environmental Sustainability Strategy sets a vision for *a thriving environment, now and into the future* and identifies a series of goals to achieve this. One of these goals is for HCC to demonstrate leadership in environmental stewardship and sustainability, with one measure of success being that *council manages waste activities to best practice to maximise recycling and diversion from landfill*.

Cleanfills are recognised across NZ as a best practice approach to diverting otherwise non recoverable inert material from Class 1-3 landfills. The provision of a cleanfill(s) will continue to be required to complement any future provision of a resource recycling and recovery facility (as outlined in Section 4 of this report).

2.4 HCC's Infrastructure Strategy 2018 - 2048

HCC's Infrastructure Strategy sets a vision for *infrastructure that meets the needs of today and tomorrow*. This vision is underpinned by a series of goals relating to improved resilience and capacity of existing networks and recognises several key infrastructure related projects including three water network renewals, road network improvement works, shared path and cycleway developments. This is in addition to those works recently announced as part of the Government's shovel ready programme of works. Infrastructure projects have the potential to generate cleanfill material requiring disposal and have historically been the source of substantial volumes of spoil material disposed of into the Wainuiomata facility (e.g. the Wainuiomata Shared Path and works upon the roading network).

This strategy recognises that the substantial capital and operational expenditures associated with the development, upgrade and maintenance of infrastructure represents a key constraint to the delivery of these projects. The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments.

2.5 HCC's Urban Growth Strategy 2012 – 2032

HCC's Urban Growth Strategy sets out the long-term approach to managing growth and change for Hutt City. This strategy identifies that much of the cost to HCC associated with the provision of new greenfield infrastructure will be associated with the development of new infrastructure. We also note that while land development costs for both brownfield and greenfield development will be borne by future developers, these will have a direct impact upon the cost of developing within the Hutt Valley (and therefore upon market costs).

The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments. It also incentivises developers to do business within the city by providing a cost-effective disposal facility.

3 Opportunities for further waste minimisation

Due to their low cost cleanfills have historically been viewed as a popular facility to divert materials away from landfills. While this remains a desirable outcome, we note that there is an increasing focus on the recovery of materials from C&D activities (e.g. demolition timber, reusable building materials, concrete and steel). This focus stems from the fact that C&D waste remains a high-volume waste stream within the Wellington Region.

A 2018 report prepared for the Wellington Regions *Waste Management and Minimisation Plan (WMMP) Working Group*[4] identified the creation of additional processing capability as having the highest potential to reduce the amount of material disposed of at landfills across the region. In Wainuiomata we know that some of the material currently disposed of (including concrete and topsoil) could be reused and recycled, if HCC had a facility that enabled it (see further discussion in Section 3.1 and 3.2 below). This directly supports the objectives of the Waste Management and Minimisation Plan (identified in Section 2.1 above) and HCC officers have expressed an interest in exploring investment in such facilities to enable an enhanced level of material recovery within Hutt City. An overview of these type of facilities is provided below.

3.1 C&D waste resource recovery

The Regional Waste Minimisation and Management Plan has a regional action to investigate and if feasible develop a region-wide resource recovery network, including targeting construction and demolition waste for enhanced resource recovery.

A typical C&D resource recovery operation may include:

- Separation of concrete and other suitable rubble for processing into 'recycled aggregate' (see Section 3.2).
- Separation and stockpiling of fill material and topsoil.
- Removal and processing of native timber (de-nailing, re-dressing)
- Removal of recyclable materials
  - Metals (components, piping, packaging) for recycling
  - Cardboard (clean, suitable for recycling)
  - Plastics (specific materials with viable markets)
  - Building components that are suitable for re-use
  - Flat glass - for crushing as aggregate/sand, or as feedstock for fibreglass manufacturing
- Separation of materials suitable for cleanfill
- Consolidation of remaining material for disposal at an appropriately consented Class 1 Landfill or Class 2 Managed Landfill.

An operation of this type in the Hutt Valley will require a suitable location with many of the location characteristics being similar to those for a cleanfill. Example characteristics include

- Good transport links
- Suitable zoning (industrial or commercial/rural)
- Supportive or involved landowner.

Note that Council is also developing proposals for upgrading the transfer station at Silverstream Landfill, including a new resource recovery area. While this area would be suitable for domestic and

[4] Titled *Regional C&D Waste Issues and Options Paper*, dated October 2018

small commercial materials, any resource recovery targeting C&D waste or other materials will need to take place elsewhere.

3.2 Concrete crushing and recycling

A reasonable volume of material disposed of to cleanfill and landfills within the Wellington Region includes concrete from demolition sites. HCC officers have identified an opportunity for Council to establish a facility that crushes and screens this concrete for use as aggregate on cycleways, driveways and other construction projects. This would provide a recovered source of construction material and reduce the waste diverted into landfill or cleanfills, while also supporting additional waste minimisation initiatives (i.e. supporting the introduction of contractual requirements relating to the use of recycled material in construction contracts tendered by HCC).

We consider that a facility for the crushing of concrete and subsequent resale as aggregate could feasibly complement operations at a future cleanfill – subject to identification of a site which can accommodate both activities. Should HCC choose to continue providing a cleanfill facility we expect this will form part of the site selection criteria.

3.3 Relationship of these facilities with cleanfill facility

We would encourage HCC to think of its waste assets as being strategically aligned with one another. These facilities do not operate completely independently, but rather as an interconnected group of assets that collectively serve its ratepayers and assist HCC in meeting its strategic objectives – as outlined in Section 2 above.

If HCC was to implement all of these specified waste minimisation measures (including the transfer station at Silverstream and C&D recovery operation) it would lead New Zealand in terms of its approach to waste minimisation. However, even in this instance it would not be possible to recover, reuse or recycle all material that is currently disposed of as cleanfill. As such cleanfill deposition facilities will remain an important part of HCC's waste infrastructure – whether they are provided by HCC or private operators.

HCC's involvement in cleanfill operations also presents opportunities that would not be feasible for sites operated exclusively by a private operator. A cleanfill operated solely by a private operator will be primarily driven by commercial drivers - maximising disposal volumes while minimising operating expenditure. On the other hand a council-operated facility can target different outcomes by effectively working within, and supporting the wider waste 'ecosystem' (landfill, cleanfill and waste recovery). As an example, a council-run facility could incentivise resource recovery through pricing mechanisms that discourage cleanfill deposition where material recovery and recycling is available. This interrelationship between the different waste assets is an important consideration to keep in mind as part of the following discussion.

4 Identifying a future cleanfill site(s)

The existing Wainuiomata Cleanfill will cease operation no later than 19 June 2022. Should HCC determine that the continued provision of a cleanfill facility is desirable in the long-term we expect that a detailed site selection process would be required - including Multi-Criteria Analysis (MCA) and public consultation. This will assist HCC in meeting its obligations under both the Resource Management Act (RMA) and Local Government Act (LGA) – both of which require the consideration of alternatives in certain circumstances[5].

HCC officers expect there will be some sites within Lower Hutt that are suitable for cleanfill operations. However, given the interest in this decision there is a strong desire not to be seen to presuppose any particular outcome. To ensure that this site identification and selection process remains as transparent and robust as possible we recommend the following three-stage process is followed.

4.1 Site identification

The goal of the initial site selection process will be to identify an initial longlist of sites for further consideration. While ultimately this list will contain a high number of sites that will prove unsuitable, the aim will be to limit the likelihood that any potentially suitable site is excluded from initial consideration. To achieve this, we expect that HCC could identify the minimum criteria required to establish an operational cleanfill on site by June 2022. Potential criteria include sites that:

- Are HCC owned;
- Have a minimum site size suited to cleanfill operations; and
- Are located within HCC's administrative boundaries.

GIS analysis could then be used to populate an initial list, which would then be used as the basis for further consideration of sites.

In an effort to confirm the likely availability of sites, T+T has undertaken an initial site search using the above criteria (using a minimum site size of 10,000 m^2). This preliminary search returned 111 sites for further investigation. We acknowledge that many of these sites will be unsuitable for the establishment of a cleanfill facility and expect these sites would be further refined through subsequent shortlisting process (as described below).

In addition, HCC staff have previously received enquiries from various parties about the viability of certain sites for future cleanfill operations, most of which currently meet the above criteria while one does not (due to being owned privately). This includes:

- The Silverstream Landfill;
- The Closed Wainuiomata Landfill;
- The Closed Waiu Street Cleanfill (privately owned);
- The Old Wingate Landfill; and
- An industrial site located in Seaview (next to the Wastewater Treatment Plant).

No decision to include or exclude any of these sites from a shortlist has been made, however they have been identified in this report in the effort of completeness.

[5] Part 6 of the LGA and Schedule 4 of the RMA.

4.2 Site shortlisting

We acknowledge that many of the sites identified within the initial site identification process will be unsuitable for the establishment of a cleanfill facility. This could be due to a number of factors including:

- Without adequate vehicle access; or
- Located within residential or commercially zoned areas; or
- Subject to a statutory acknowledgement (an association between tangata whenua and a specified area that is specifically recognised by the Crown); or
- With a topographic profile unsuited to bulk filling; or
- Subject to specified District Plan or Regional Plan overlays (i.e. Significant Natural Areas); or
- Located within reserve land or native forest; or
- Any other agreed criteria.

Refining these criteria would be undertaken in partnership with HCC officers and the site operator, and we expect that some of these criteria would represent fatal flaws. Any site exhibiting a fatal flaw would then be excluded from further consideration. Those sites which do not exhibit a fatal flaw could then be added to a shortlist of prospective sites for further scoring (as described below). Once this shortlist is populated HCC would have the opportunity to consult with the community and seek its views on the respective sites.

4.3 Site selection process

Following receipt of community feedback on the shortlisted sites, HCC would then need to identify a preferred site(s). We expect the most robust mechanism for selecting a preferred site is via Multi-Criteria Analysis (MCA). This is a widely used tool that involves scoring different options on a range of aspects, attributes or criteria which are reflective of the issues that need to be considered to achieve the best outcome. These different criteria are then weighted, scores aggregated, and a preferred outcome, site or route is identified as a result.

The scoring criteria would need to be refined, however some example criteria could include:

- Neighbours (proximity, number and likely impact);
- Ease of access;
- Lot size and site capacity (both in terms of volume of cleanfill material and ability to cater to other recycling and reuse facilities);
- Fiscal cost to establish;
- Natural hazards;
- Opportunity costs associated with the site;
- Environmental effects (ecological, noise, visual etc);
- Impacts upon tangata whenua; and
- Proximity to source of material.

Scoring would typically involve a structured workshop with key stakeholders in attendance to discuss and score the various options against agreed criteria. Once a preferred site(s) is available HCC can then commence the necessary investigations and consenting processes to facilitate the commencement of operations.

5 Next steps

The purpose of this report was to provide HCC's CLT with information to support making a decision about whether HCC wish to continue providing such a facility. If HCC do wish to continue providing such a facility we expect the following next steps will be required:

1. Prepare a list of prospective sites based upon agreed minimum criteria;
2. Undertake a fatal flaws analysis and establish a shortlist of sites based upon agreed site criteria;
3. Undertake community consultation, seeking community views of the shortlisted sites;
4. Undertake a Multi-Criteria Analysis (MCA) of the shortlisted sites to identify a preferred site(s);
5. Undertake site investigations to confirm suitability of the preferred site(s);
6. Prepare and obtain the necessary suite of resource consents to authorise operations;
7. Undertake any necessary site improvements (e.g. access road improvements, erosion and sediment controls etc); and
8. Commence cleanfill operations.

6 Applicability

This report has been prepared for the exclusive use of our client Hutt City Council, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

Tonkin & Taylor Ltd

Report prepared by:	Authorised for Tonkin & Taylor Ltd:
.....	.....
Alastair Meehan	Ed Breese
Planner	Project Director

Technically reviewed by Chris Purchas on 22 September 2020.

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REPORT

Tonkin+Taylor

Hutt City's cleanfill demand and future site analysis

Discussion Paper

Prepared for
Hutt City Council
Prepared by
Tonkin & Taylor Ltd
Date
September 2020
Job Number
84466.006.v1

Exceptional thinking together
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Document Control

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Distribution:

Hutt City Council	1 PDF copy
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1 Introduction

1.1 Purpose of this report

The Wainuiomata Cleanfill is the only active remaining cleanfill facility within Hutt City's administrative boundaries and therefore plays a key role among Hutt City Council's (HCC) waste assets. It also plays a vital role in the economic development of the City. Operations at this site must cease by 19 June 2022 and a decision is required about whether HCC wishes to continue providing this service at another site.

In making this decision, consideration should be given to HCC's lead role in the minimisation of waste generation in the City, and the symbiotic relationship between an operational cleanfill, the landfill and the re-use and recycling of certain waste materials. This report has therefore been prepared to support HCC's Corporate Leadership Team (CLT) in making a decision about the long-term desirability of providing such a facility and how it aligns with Council's wider objectives.

This report has been prepared in accordance with Tonkin & Taylor Ltd's (T+T) letter of engagement dated 6 July 2020 and with our current contract for services dated 30 August 2006.

1.2 What is a cleanfill?

The Ministry for the Environment (MfE) defines cleanfills as "*a low-cost alternative to landfills for inert waste that will have no potentially adverse environmental effect, or only minor effects*". They form an important part of the waste asset hierarchy, and are sometimes referred to as Class 4 landfills, per the technical guidance issued by WasteMINZ[1] and summarised below:

- Class 1 landfill: Municipal solid waste landfills and most industrial waste landfills.
- Class 2 landfill: Construction and demolition landfills and some industrial waste landfills.
- Class 3 landfill: Managed or controlled fills (which accept cleanfill and some contaminated materials).
- Class 4 landfill: Cleanfills.
- Closed landfill: A landfill that no longer accepts material for disposal.

Cleanfills are subject to stringent waste acceptance criteria. Accordingly, the material deposited into a cleanfill typically comprises inert construction and demolition (C&D) materials (i.e. soil, rock, concrete, bricks and similar material) that will not break down when disposed to ground. These limitations prevent many materials being disposed of at a cleanfill, including:

- Contaminated soil;
- Contaminated C&D waste (e.g. asbestos);
- Non-inert C&D waste (e.g. timber and plasterboard);
- Household waste; and
- Garden waste.

This enables operators to accept material without the need for the construction of expensive liners, leachate collection systems, gas collection systems, the collection of waste levies or the associated level of environmental monitoring. In turn, this provides a cost-effective facility for contractors to dispose of suitable material, thereby keeping the cost of development down[2] while also preserving

[1] Draft WasteMINZ Technical Guidelines for the Disposal of Residual Waste and other Material (Land Disposal Technical Guidelines) dated June 2013

[2] For comparison, the Wainuiomata Cleanfill currently charges contractors $12 / cubic metre to dispose cleanfill while the rate for disposing general waste at the Silverstream Landfill is $126.50 / tonne (incl. GST).

airspace within higher class landfills around the region. This extends the operational life of these regionally significant pieces of infrastructure (including the Silverstream Landfill).

1.3 Demand for cleanfill deposition facilities

Development within the Hutt Valley generates substantial volumes of cleanfill material. In the past 4 months alone (May – August 2020) contractors have paid to deposit approximately 35,000 m^3 of loose cleanfill material into the Wainuiomata facility. While the exact volumes vary, the operator estimates that approximately 50% of material disposed of at the Wainuiomata Cleanfill is generated within Wainuiomata, while the majority of the remaining material is generated within the Hutt Valley (including Upper and Lower Hutt). While there is nothing preventing material from further afield (i.e. greater Wellington or the Wairarapa) being accepted, there are commercial incentives for contractors to reduce haulage distances and associated costs.

Material disposed at the cleanfill originates from construction projects, including:

- The Queensgate Mall redevelopment.
- The Palliser Hotel redevelopment.
- Wainuiomata Mall redevelopment.
- Various residential developments across the city.
- Ongoing roading maintenance activities across the city (for example slip remediation along Coast Road). Material classified as mud and slips accounted for approximately 500 m^3 between May – July 2020.

HCC is faced with numerous infrastructure projects in the coming years that could generate and therefore require a facility to dispose of cleanfill. This includes the Eastern Bays cycleway, Naenae Pool redevelopment, Three Waters network renewals and ongoing road maintenance.

In addition to the pipeline of infrastructure projects, HCC is faced with growing demand for residential development. In the first three quarters of the 2020/21 financial year, HCC had received 1,287 building consents with a combined value of $377.7 million – a 49% increase from the previous period. Many of these developments can be reasonably expected to require the ability to dispose of material associated with the site preparation works (predominantly from site scraping and the establishment of flat building platforms). The availability of cost-effective deposition facilities to support these developments directly impacts their costs and associated viability. Notably, when the existing Wainuiomata Cleanfill temporarily closed in early 2020, feedback was received from several developers that the increased cost of having to go to Wellington affected the viability of their projects. This preliminary analysis would indicate that demand for cleanfill facilities is expected to continue for the foreseeable future, and the ongoing provision of a suitable cleanfill facility will be required to facilitate this development.

1.4 HCC's existing cleanfill

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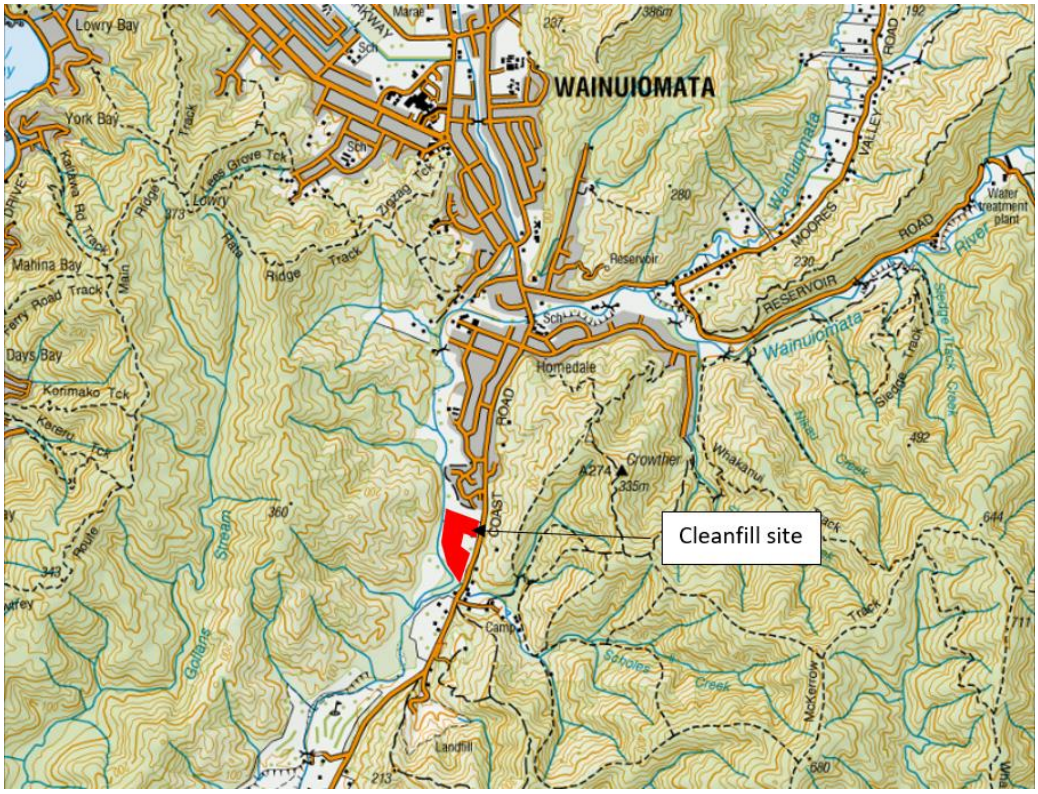

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1.5 History of the Wainuiomata Cleanfill

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- Controls to manage noise, traffic and the tracking of material onto any nearby roads (e.g. vehicle washes, noise limits and associated monitoring and transportation assessments); and
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The Wellington Regional Waste Management and Minimisation Plan 2017 – 2023 is a joint plan prepared for all territorial authorities in the Wellington Region under the Waste Minimisation Act 2008. The purpose of this plan is to set the strategic priorities and frameworks for managing waste within the region, with a key objective to reduce the amount of waste being disposed of in Class 1 landfills from 600 kg per person per annum to 400 kg per person per annum by 2026.

To achieve this, the Waste Management and Minimisation Plan sets a number of objectives, including:

1. To reduce the total quantity of waste to landfill, with an emphasis on wastes that create the most human and environmental harm.
2. To provide environmental, social, economic and cultural benefits by increasing the amount of waste diverted from landfill via reuse, recovery and/or recycling.
3. To investigate the use of available recovery and treatment technologies and service methodologies and apply these where appropriate.
4. To investigate and where appropriate develop partnerships, joint working and co-operation across the private and community sectors as well as territorial and regional councils, including shared services.
5. To work with service providers to identify efficiencies while maintaining or improving service levels.
6. To consider both short and long-term cost impacts of all actions across the community including economic costs and benefits.
7. To consider the environmental impacts of all options and ensure the overall environmental impact is taken into account in decision making.

The provision of a viable cleanfill(s) within a region is considered to either directly or indirectly support those objectives by:

1. Directly reducing the volumes of waste material that would otherwise be disposed to landfill or unauthorised tip sites.
2. Supporting the future provision of a resource recovery facility (as discussed in Section 4 below).
3. Providing a cost-effective facility for service providers (including property developers, infrastructure providers and maintenance contractors) to dispose of suitable inert material and thereby reduce development costs.
4. Extending the life of the region's other landfills (including Silverstream) by diverting suitable material from those sites.

2.2 Regional Policy Statement for the Wellington Region

The Regional Policy Statement (RPS) sets a specific objective (Objective 11) and policy (Policy 65) promoting the reduction of waste going to landfills. Objective 11 states that the *quantity of waste disposed of is reduced* while Policy 65 promotes the reduction, reuse, and recycling of waste.

Cleanfills are specifically identified as one method of diverting otherwise clean and inert material from the waste-stream to assist with achieving this objective and policy.

2.3 HCC's Environmental Sustainability Strategy 2015 - 2045

HCC's Environmental Sustainability Strategy sets a vision for *a thriving environment, now and into the future* and identifies a series of goals to achieve this. One of these goals is for HCC to demonstrate leadership in environmental stewardship and sustainability, with one measure of success being that *council manages waste activities to best practice to maximise recycling and diversion from landfill*.

Cleanfills are recognised across NZ as a best practice approach to diverting otherwise non recoverable inert material from Class 1-3 landfills. The provision of a cleanfill(s) will continue to be required to complement any future provision of a resource recycling and recovery facility (as outlined in Section 4 of this report).

2.4 HCC's Infrastructure Strategy 2018 - 2048

HCC's Infrastructure Strategy sets a vision for *infrastructure that meets the needs of today and tomorrow*. This vision is underpinned by a series of goals relating to improved resilience and capacity of existing networks and recognises several key infrastructure related projects including three water network renewals, road network improvement works, shared path and cycleway developments. This is in addition to those works recently announced as part of the Government's shovel ready programme of works. Infrastructure projects have the potential to generate cleanfill material requiring disposal and have historically been the source of substantial volumes of spoil material disposed of into the Wainuiomata facility (e.g. the Wainuiomata Shared Path and works upon the roading network).

This strategy recognises that the substantial capital and operational expenditures associated with the development, upgrade and maintenance of infrastructure represents a key constraint to the delivery of these projects. The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments.

2.5 HCC's Urban Growth Strategy 2012 – 2032

HCC's Urban Growth Strategy sets out the long-term approach to managing growth and change for Hutt City. This strategy identifies that much of the cost to HCC associated with the provision of new greenfield infrastructure will be associated with the development of new infrastructure. We also note that while land development costs for both brownfield and greenfield development will be borne by future developers, these will have a direct impact upon the cost of developing within the Hutt Valley (and therefore upon market costs).

The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments. It also incentivises developers to do business within the city by providing a cost-effective disposal facility.

3 Opportunities for further waste minimisation

Due to their low cost cleanfills have historically been viewed as a popular facility to divert materials away from landfills. While this remains a desirable outcome, we note that there is an increasing focus on the recovery of materials from C&D activities (e.g. demolition timber, reusable building materials, concrete and steel). This focus stems from the fact that C&D waste remains a high-volume waste stream within the Wellington Region.

A 2018 report prepared for the Wellington Regions *Waste Management and Minimisation Plan (WMMP) Working Group*[4] identified the creation of additional processing capability as having the highest potential to reduce the amount of material disposed of at landfills across the region. In Wainuiomata we know that some of the material currently disposed of (including concrete and topsoil) could be reused and recycled, if HCC had a facility that enabled it (see further discussion in Section 3.1 and 3.2 below). This directly supports the objectives of the Waste Management and Minimisation Plan (identified in Section 2.1 above) and HCC officers have expressed an interest in exploring investment in such facilities to enable an enhanced level of material recovery within Hutt City. An overview of these type of facilities is provided below.

3.1 C&D waste resource recovery

The Regional Waste Minimisation and Management Plan has a regional action to investigate and if feasible develop a region-wide resource recovery network, including targeting construction and demolition waste for enhanced resource recovery.

A typical C&D resource recovery operation may include:

- Separation of concrete and other suitable rubble for processing into 'recycled aggregate' (see Section 3.2).
- Separation and stockpiling of fill material and topsoil.
- Removal and processing of native timber (de-nailing, re-dressing)
- Removal of recyclable materials
  - Metals (components, piping, packaging) for recycling
  - Cardboard (clean, suitable for recycling)
  - Plastics (specific materials with viable markets)
  - Building components that are suitable for re-use
  - Flat glass - for crushing as aggregate/sand, or as feedstock for fibreglass manufacturing
- Separation of materials suitable for cleanfill
- Consolidation of remaining material for disposal at an appropriately consented Class 1 Landfill or Class 2 Managed Landfill.

An operation of this type in the Hutt Valley will require a suitable location with many of the location characteristics being similar to those for a cleanfill. Example characteristics include

- Good transport links
- Suitable zoning (industrial or commercial/rural)
- Supportive or involved landowner.

Note that Council is also developing proposals for upgrading the transfer station at Silverstream Landfill, including a new resource recovery area. While this area would be suitable for domestic and

[4] Titled *Regional C&D Waste Issues and Options Paper*, dated October 2018

small commercial materials, any resource recovery targeting C&D waste or other materials will need to take place elsewhere.

3.2 Concrete crushing and recycling

A reasonable volume of material disposed of to cleanfill and landfills within the Wellington Region includes concrete from demolition sites. HCC officers have identified an opportunity for Council to establish a facility that crushes and screens this concrete for use as aggregate on cycleways, driveways and other construction projects. This would provide a recovered source of construction material and reduce the waste diverted into landfill or cleanfills, while also supporting additional waste minimisation initiatives (i.e. supporting the introduction of contractual requirements relating to the use of recycled material in construction contracts tendered by HCC).

We consider that a facility for the crushing of concrete and subsequent resale as aggregate could feasibly complement operations at a future cleanfill – subject to identification of a site which can accommodate both activities. Should HCC choose to continue providing a cleanfill facility we expect this will form part of the site selection criteria.

3.3 Relationship of these facilities with cleanfill facility

We would encourage HCC to think of its waste assets as being strategically aligned with one another. These facilities do not operate completely independently, but rather as an interconnected group of assets that collectively serve its ratepayers and assist HCC in meeting its strategic objectives – as outlined in Section 2 above.

If HCC was to implement all of these specified waste minimisation measures (including the transfer station at Silverstream and C&D recovery operation) it would lead New Zealand in terms of its approach to waste minimisation. However, even in this instance it would not be possible to recover, reuse or recycle all material that is currently disposed of as cleanfill. As such cleanfill deposition facilities will remain an important part of HCC's waste infrastructure – whether they are provided by HCC or private operators.

HCC's involvement in cleanfill operations also presents opportunities that would not be feasible for sites operated exclusively by a private operator. A cleanfill operated solely by a private operator will be primarily driven by commercial drivers - maximising disposal volumes while minimising operating expenditure. On the other hand a council-operated facility can target different outcomes by effectively working within, and supporting the wider waste 'ecosystem' (landfill, cleanfill and waste recovery). As an example, a council-run facility could incentivise resource recovery through pricing mechanisms that discourage cleanfill deposition where material recovery and recycling is available. This interrelationship between the different waste assets is an important consideration to keep in mind as part of the following discussion.

4 Identifying a future cleanfill site(s)

The existing Wainuiomata Cleanfill will cease operation no later than 19 June 2022. Should HCC determine that the continued provision of a cleanfill facility is desirable in the long-term we expect that a detailed site selection process would be required - including Multi-Criteria Analysis (MCA) and public consultation. This will assist HCC in meeting its obligations under both the Resource Management Act (RMA) and Local Government Act (LGA) – both of which require the consideration of alternatives in certain circumstances[5].

HCC officers expect there will be some sites within Lower Hutt that are suitable for cleanfill operations. However, given the interest in this decision there is a strong desire not to be seen to presuppose any particular outcome. To ensure that this site identification and selection process remains as transparent and robust as possible we recommend the following three-stage process is followed.

4.1 Site identification and longlisting

The goal of the initial site selection process will be to identify an initial longlist of sites for further consideration. While ultimately this list will contain a high number of sites that will prove unsuitable, the aim will be to limit the likelihood that any potentially suitable site is excluded from initial consideration. To achieve this, we expect that HCC could identify the minimum criteria required to establish an operational cleanfill on site by June 2022. Proposed criteria include sites that:

- Are HCC owned;
- Have a minimum site size of 10,000 m^2; and
- Are located within HCC's administrative boundaries.

GIS analysis could then be used to populate this initial longlist, which would be used as the basis for further consideration of sites.

4.2 Site shortlisting

We acknowledge that many of the sites identified within the initial longlist will be unsuitable for the establishment of a cleanfill facility. This could be due to a number of factors including:

- Without adequate vehicle access; or
- Located within residential or commercially zoned areas; or
- Subject to a statutory acknowledgement (an association between tangata whenua and a specified area that is specifically recognised by the Crown); or
- With a topographic profile unsuited to bulk filling; or
- Subject to specified District Plan or Regional Plan overlays (i.e. Significant Natural Areas); or
- Located within reserve land or native forest; or
- Any other agreed criteria.

Refining these criteria would be undertaken in partnership with HCC officers and the site operator, and we expect that some of these criteria would represent fatal flaws. Any site exhibiting a fatal flaw would then be excluded from further consideration. Those sites which do not exhibit a fatal flaw could then be added to a shortlist of prospective sites. Once this shortlist is populated HCC would have the opportunity to consult with the community and seek its views on the respective sites.

[5] Part 6 of the LGA and Schedule 4 of the RMA.

4.3 Site selection process

Following receipt of community feedback on the shortlisted sites, HCC would then need to identify a preferred site(s). We expect the most robust mechanism for selecting a preferred site is via Multi-Criteria Analysis (MCA). This is a widely used tool that involves scoring different options on a range of aspects, attributes or criteria which are reflective of the issues that need to be considered to achieve the best outcome. These different criteria are then weighted, scores aggregated, and a preferred outcome, site or route is identified as a result.

The scoring criteria would need to be refined, however some example criteria could include:

- Neighbours (proximity, number and likely impact);
- Ease of access;
- Lot size and site capacity (both in terms of volume of cleanfill material and ability to cater to other recycling and reuse facilities);
- Fiscal cost to establish;
- Natural hazards;
- Opportunity costs associated with the site;
- Environmental effects (ecological, noise, visual etc);
- Impacts upon tangata whenua; and
- Proximity to source of material.

Scoring would typically involve a structured workshop with key stakeholders in attendance to discuss and score the various options against agreed criteria. Once a preferred site(s) is available HCC can then commence the necessary investigations and consenting processes to facilitate the commencement of operations.

5 Next steps

The purpose of this report was to provide HCC's CLT with information to support making a decision about whether HCC wish to continue providing such a facility. If HCC do wish to continue providing such a facility we expect the following next steps will be required:

1. Establish a longlist of prospective sites based upon agreed minimum criteria;
2. Undertake a fatal flaws analysis and establish a shortlist of sites based upon agreed site criteria;
3. Undertake community consultation, seeking community views of the shortlisted sites;
4. Undertake a Multi-Criteria Analysis (MCA) of the shortlisted sites to identify a preferred site(s);
5. Undertake site investigations to confirm suitability of the preferred site(s);
6. Prepare and obtain the necessary suite of resource consents to authorise operations;
7. Undertake any necessary site improvements (e.g. access road improvements, erosion and sediment controls etc); and
8. Commence cleanfill operations.

6 Applicability

This report has been prepared for the exclusive use of our client Hutt City Council, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

Tonkin & Taylor Ltd

Report prepared by:	Authorised for Tonkin & Taylor Ltd:
	
.....	.....
Alastair Meehan	Ed Breese
Planner	Project Director

Technically reviewed by Chris Purchas on 22 September 2020.

ALME

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Euan Kyle

From: Alastair Meehan
Sent: Friday, 21 August 2020 5:05 PM
To: Dave Dews
Cc: Ed Breese
Subject: Cleanfill long-term planning - Discussion document
Attachments: Updated Cleanfill Report - future demand (for HCC review).asd.docx; Suitable_Sites_For_Cleanfilling_Edits.pdf; Export_Output_2.csv

Hi Dave,

As discussed, please find attached the draft discussion document relating to the long-term provision of a cleanfill facility within HCC's administrative boundaries. This is provided for HCC's initial review.

Happy to redraft, add or amend content as you see fit. Let me know if you'd like to arrange a sit down once you have had the chance to discuss this with Helen.

Ngā Mihi | Kind regards,
Alastair Meehan | Planner

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Euan Kyle

From: Alastair Meehan
Sent: Friday, 6 November 2020 10:17 AM
To: Dave Dews
Subject: Cleanfill long-term planning - Updated discussion document
Attachments: Cleanfill discussion document - November 2020.docx

Hi Dave,

Per your recent instructions and following the request from Helen, I've updated the discussion document to include discussion about prospective sites. See tracked changes in Section 4.1.

Let me know if this is what HCC had anticipated. If so, I'll finalise for issue.

Ngā Mihi | Kind regards,

Alastair Meehan | Planner

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Agenda

Community Liaison Group meeting - June 2020

Attendees:

Alastair Meehan	Wira	Dawn McKinley
Gary O'Mera	David Smith	Trish Ranstead
Bob McWhirter	Sally-Ann Moffat	Jim S
Mayor Campbell Barry	TBC	Christine
Dave Dews	John Gray	Barry
Councillor Keri Brown	Miria O'Regan	Gabriel Tupou

Comment [AM1]: My apologies – the name of the woman seated next to [redacted] escapes me. I recall she mentioned her daughter may be interested in a future site visit (outside of work hours – possibly on a Sunday). Hoping that someone can help me out here.

#	Topic to discuss	Time allocated	Notes from meeting
1	Actions from previous CLG meeting	5 min	No progress made with the investigation into CCTV onsite. Will provide further update during next meeting.
2	Discuss minutes from CLG meeting 1	5 min	Issue raised with accuracy of minutes. The following revisions were tabled: • Sally-Ann tabled 4x attachments to append • To include commentary on the judder bars in the village – something to seek input from HCC's roading team; and • Include comment about Dave's availability – happy to be contacted whenever an issue is observed. Sally-Ann to email Alastair the requested changes for inclusion.
3	Updates regarding recent site visit	5 min	Both Councillor Brown and Sally-Ann attended a site visit on 4th June. General observation that the site looked good and that both were happy with the planting. Discussion about the conditions of consent (see below). Comment that others may have liked to attend but were unable due to short notice and timing (during work hours). Agreement that we can look to schedule further visit (on a Sunday) to enable wider CLG to visit site. Date TBC

4	Conditions of consent – discussion regarding compliance	15 min	Following on from the site visit discussion, [redacted] discussed the conditions of consent (RM190050). She believes that there are 12 conditions that HCC are non-compliant with, including 6 major breaches. These included conditions relating to: • CLG meetings (Condition 5); • Material on the road (Condition 8) • Noise and noise monitoring (Conditions 12 and 16); • Informing CLG of construction works (Condition 14); and • Water cart remaining onsite (Condition 18). This point remains the subject of some disagreement, however in the interest of time we agreed the following: • That the ultimate decision about whether conditions are being complied with sits with the compliance teams at HCC and GWRC respectively. The concerns raised by [redacted] have been passed on to these teams, and we are happy for discussions to continue; and • Regardless of whether a condition is technically being complied with, the CLG are encouraged to get in touch with Dave if they are having issues. If Dave is aware of issues he can try and rectify – even if that isn't strictly something required through the consent conditions (i.e. truck reversing alarms). There will continue to be good faith attempts to address concerns.
5	Overview of works undertaken onsite (+ upcoming works)	10 min	Remedial planting • 4,500 native plants sourced and planted onsite – located within Stages 1 and 2; • Species list was directly informed by feedback during CLG meeting 1. Large specimen trees and food sources for Kereru included; • 3 monthly maintenance schedule to begin with. Plants previously planted in Stage 1 are establishing well – no

			sign of rabbits destroying the establishing plants; and • Planting to continue next season. Order has been made for plants for remaining batter slopes (excluding operational areas). Vehicle wash • On site and operational. Acknowledged that there were some teething issues during its first week of operations (requiring the road to be swept) however these should now be resolved. Upcoming construction works • Repair of a culvert located through the Stage 2 fill area; and • Continued construction of block wall along the western edge of the fill footprint. Gary noted the presence of the water main running parallel to Coast to ensure Bob is aware / doesn't bury it. Bob confirmed. Noise monitoring • Supposed to occur within 30 days of operations commencing however was delayed due to Covid-19 restrictions; • Darran Humpheson (noise expert at T+T) is currently arranging for suitably qualified person + calibrated equipment. Also confirming the noise monitoring procedures to ensure monitoring is representative; • Suggestion made that monitoring should be undertaken without advance notice to best reflect noise conditions. Alastair to pass that suggestion to Darran; and • To occur by 10 July 2020 as agreed with HCC's regulatory team.
6	Volume received	2 min	2,355 m^3 received between 1 February and 30 April. Very low due to Covid-19 This information is tracked through a piece of software called 'Landfill 2000' and will be made available to council + CLG. Need to package information up and ensure any commercially sensitive information removed

			prior.
7	Issues observed	5 min	Noise was discussed at length. General observation that there had been a noticeable improvement in noise characteristics recently and acknowledgement of Bob's efforts in this regard. Notwithstanding it remains a sensitive issue and CLG members request that operations remain aware of the potential for disruption and to continue reduce it where possible.
8	Alternative sites	2 min	Two stages associate with a site selection process: 1. For HCC to decide whether it wishes to continue providing a cleanfill facility in the long-term; and 2. If so, to undertake a site evaluation and community consultation process. This is underway and CLG will be provided further update at next CLG meeting. Agreed that Dave and Alastair to provide broad overview of regional initiatives in the waste minimisation space at next meeting to provide some context. Remain open to site suggestions. No decision has been made, but old Wingate site being considered as a result of previous suggestion by Christine.
9	Other matters	Any extra time	Discussed the following: • The Mayor expressed a commitment to attend these meeting where his schedule allows; • Councillor Brown expressed an ongoing interest in ensuring the site ceases operation as soon as possible (no later than 19 June 2022 per consent conditions); • Several issues related to the roading network were raised (including on Wainuiomata Hill). These fall outside the scope of this group however individuals are encouraged to continue discussion in other forum(s);

			• Bob expressed a concern that the cleanfill was sometimes blamed for issues outside of its control – particularly relating to material on the road (from adjoining driveways and truck movements not associated with the cleanfill). He asked that members consider these possibilities and be fair when making future complaints; and • CLG members wanted the record to note opposition to any future cleanfill operation within Wainuiomata noted. While Dave explained that this could not be committed to within this meeting, but that any future site would need to go through a site selection and consultation process.

Euan Kyle

From: Alastair Meehan
Sent: Friday, 12 June 2020 5:19 PM
To: Dave Dews
Subject: Draft minutes from CLG meeting - for your review
Attachments: CLG Agenda 2 - June 2020.DOCX

Hey Dave,

Have a look. Let me know if you'd like any changes, otherwise I'll send out to the CLG - unless you want to?

Ngā Mihi | Kind regards,
Alastair Meehan | Planner

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Euan Kyle

From: Alastair Meehan
Sent: Monday, 28 September 2020 5:00 PM
To: Helen Oram
Cc: Dave Dews; Jörn Scherzer
Subject: RE: Cleanfill discussion document - for HCC review - JS.docx
Attachments: Cleanfill discussion document - September 2020.pdf

Hi all,

Please find the finalised discussion document attached.

Ngā Mihi | Kind regards,
Alastair Meehan | Planner

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From: Helen Oram <Helen.Oram@huttcity.govt.nz>
Sent: Thursday, 24 September 2020 8:02 PM
To: Alastair Meehan <AMeehan@tonkintaylor.co.nz>
Cc: Dave Dews <Dave.Dews@huttcity.govt.nz>; Jörn Scherzer <Joern.Scherzer@huttcity.govt.nz>
Subject: Cleanfill discussion document - for HCC review - JS.docx

Hi
Thanks Alistair.

Please see my comments.

Cheers
Helen

Helen Oram
Director Environmental & Sustainability

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand
T 04 570 6915, **M** 027 6294337, **W** www.huttcity.govt.nz

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Euan Kyle

From: Jörn Scherzer
Sent: Thursday, 24 September 2020 4:47 PM
To: Dave Dews; Helen Oram
Cc: Alastair Meehan
Subject: RE: Cleanfill discussion document - for review
Attachments: Cleanfill discussion document - for HCC review - JS.docx

Correct file attached this time, apologies

From: Jörn Scherzer
Sent: Thursday, 24 September 2020 2:20 PM
To: Dave Dews; Helen Oram
Cc: AMeehan@tonkintaylor.co.nz
Subject: RE: Cleanfill discussion document - for review
Importance: High

Hi guys

Attached my (minor) comments on the paper. This is now looking very good I think.

In terms of the paper to CLT, I think it needs a brief summary of the TT report findings / recommendations.

So I would suggest that TT updates the draft document (could be done within a day or two), and that the revised CLT paper goes up in the middle of next week, for discussion on 5 October.

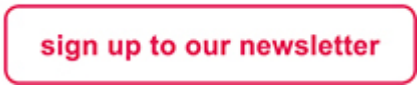
Then a workshop with Council in mid-October if possible, then the Council decision paper in mid-November (paper would need to be done by mid October, but can be based largely on the TT report).

Over to you Helen.

Cheers
J

Jörn Scherzer
Sustainability & Resilience Manager

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand
T , M 021 125 0997, W www.huttcity.govt.nz



From: Dave Dews
Sent: Wednesday, 23 September 2020 12:32 PM
To: Helen Oram; Jörn Scherzer
Subject: Fwd: Cleanfill discussion document - for review

Hi Team

For your review and approval Cleanfill direction, before we submit to the CLT.

Cheers
Dave

Begin forwarded message:

> **From:** Alastair Meehan <AMeehan@tonkintaylor.co.nz>
> **Date:** 23 September 2020 at 10:40:44 NZST
> **To:** Dave Dews <Dave.Dews@huttcity.govt.nz>
> **Cc:** Ed Breese <EBreese@tonkintaylor.co.nz>
> **Subject: Cleanfill discussion document - for review**
>
> Morning Dave,
>
> I've attached the draft discussion document and a CLT briefing memo. Both are ready for review as agreed last Monday. Let me know if you'd like any further changes.
>
> I will finalise the discussion document (remove draft watermark, PDF and insert signatures) for presentation to CLT once you and Helen confirm you're happy.
>
> Ngā Mihi | Kind regards,
> **Alastair Meehan | Planner**
>
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Euan Kyle

From: Alastair Meehan
Sent: Friday, 12 June 2020 3:59 PM
To: Dave Dews; Parvati Rotherham
Cc: Paul Duffin
Subject: RE: Report on Breaches at the Wainuiomata Cleanfill
Attachments: Search for alternative sites - cleanfilling.docx

Hi Parvati,

I've spoken to Dave and attached a document that is very similar to something that was sent to Councillor Keri Brown a few weeks ago about this same topic. This also echoes discussions held at the CLG meeting yesterday evening.

Dave - can you just check you're happy with the minor changes (in the last paragraph) before it goes out?

-----Original Message-----
From: Dave Dews <Dave.Dews@huttcity.govt.nz>
Sent: Friday, 12 June 2020 12:24 PM
To: Parvati Rotherham <Parvati.Rotherham@huttcity.govt.nz>
Cc: Paul Duffin <Paul.Duffin@huttcity.govt.nz>
Subject: Re: Report on Breaches at the Wainuiomata Cleanfill

Hi Parvati

Will do.

Cheers
Dave

Dave Dews
Contracts Solid Waste

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand T , M 021 686 749, W
https://apc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.huttcity.govt.nz%2F&data=02%7C01%7C%7C87d44f36aa9843179f6708d80e66dac1%7C5a6c15cc1394406a92310d93dd9954ae%7C0%7C0%7C637275182235337139&sdata=Z5ntAzp3G6JVqn%2FmVfcvQ9uPaIw7nPdvIm2OzayRsKE%3D&reserved=0<https://apc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.huttcity.govt.nz%2F&data=02%7C01%7C%7C87d44f36aa9843179f6708d80e66dac1%7C5a6c15cc1394406a92310d93dd9954ae%7C0%7C0%7C637275182235337139&sdata=Z5ntAzp3G6JVqn%2FmVfcvQ9uPaIw7nPdvIm2OzayRsKE%3D&reserved=0>

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On 12/06/2020, at 10:27, Parvati Rotherham <Parvati.Rotherham@huttcity.govt.nz> wrote:

Hi Dave, I need to respond to the OIR Below. Can you please give me a response to I would also like an update on the progress that is being made with finding an alternate location for a cleanfill in Lower Hutt.

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If we can have something done by mid-next week that would be much appreciated.

Thanks,

Parvati

From: Jekkie Suwanposee
Sent: Friday, 12 June 2020 9:34 AM
To: Parvati Rotherham; Derek Kerite
Subject: FW: Report on Breaches at the Wainuiomata Cleanfill

Hi Parvati and Derek,

This enquiries has come through yesterday. They want to have all info within this month, see below.
If you want to put it in as an OIR please let me know.

Cheers

Jekkie

From: Gabriel Tupou
Sent: Thursday, 11 June 2020 2:12 PM
To: HCC Environmental Consents
Cc: Toi Lealofi; Dawn McKinley
Subject: Report on Breaches at the Wainuiomata Cleanfill

Tēnā koe,

I would like to request a report from HCC for the WCB Environment portfolio of which I am an associate member. Dawn is the Lead for Environment but has advised that she has conflicts of interests which prevent her from making this request.

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I would also like an update on the progress that is being made with finding an alternate location for a cleanfill in Lower Hutt.

We would like this report in time for our June Wainuiomata Community Board meeting.

Nāku iti noa, nā

Gabriel Tupou

CHAIRPERSON
Wainuiomata Community Board

<OIR Response 14th August 2019.pdf>

Euan Kyle

From: Dave Dews
Sent: Friday, 12 June 2020 4:01 PM
To: Alastair Meehan
Cc: Parvati Rotherham; Paul Duffin
Subject: Re: Report on Breaches at the Wainuiomata Cleanfill

Hi Alistair

Yes perfect 👌

Cheers
Dave

Dave Dews
Contracts Solid Waste

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand T , M 021 686 749, W https://apc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.huttcity.govt.nz%2F&data=02%7C01%7C%7C29160a2256444696cc6d08d80e8541cb%7C5a6c15cc1394406a92310d93dd9954ae%7C0%7C0%7C637275312810897820&sdata=132ezk%2FSE52X67i%2BKVbnfiZRqmiDFJgk0GRygDdia8g%3D&reserved=0, F https://apc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fhuttcitycouncil&data=02%7C01%7C%7C29160a2256444696cc6d08d80e8541cb%7C5a6c15cc1394406a92310d93dd9954ae%7C0%7C0%7C6372753128108978 20&sdata=61FJ7ASrgWYp4GDttLE2tPTHknqx1JvXImcZmbZHmrE%3D&reserved=0

> On 12/06/2020, at 15:59, Alastair Meehan <AMeehan@tonkintaylor.co.nz> wrote:
>
> Hi Parvati,
>
> I've spoken to Dave and attached a document that is very similar to something that was sent to Councillor Keri Brown a few weeks ago about this same topic. This also echoes discussions held at the CLG meeting yesterday evening.
>
> Dave - can you just check you're happy with the minor changes (in the last paragraph) before it goes out?
>
> -----Original Message-----
> From: Dave Dews <Dave.Dews@huttcity.govt.nz>
> Sent: Friday, 12 June 2020 12:24 PM
> To: Parvati Rotherham <Parvati.Rotherham@huttcity.govt.nz>
> Cc: Paul Duffin <Paul.Duffin@huttcity.govt.nz>
> Subject: Re: Report on Breaches at the Wainuiomata Cleanfill
>
> Hi Parvati
>
> Will do.
>
> Cheers
> Dave

>
>
> Dave Dews
> Contracts Solid Waste
>
> Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040,
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>
> Nāku iti noa, nā
>
> Gabriel Tupou
> CHAIRPERSON
> Wainuiomata Community Board
>
> <OIR Response 14th August 2019.pdf>
> NOTICE: This email together with any attachments is confidential, may be subject to legal privilege and may contain proprietary information, including information protected by copyright. If you are not the intended recipient, please do not copy, use or disclose the information in it, and confidentiality and privilege are not waived. If you have received this in error, please notify us immediately by return email and delete this email.
> <Search for alternative sites - cleanfilling.docx>

Good afternoon Gabriel,

As you will be aware, the Wainuiomata Cleanfill will cease operations no later than the 19 June 2022. This date is specified within the consent issued by HCC (RM190050) and aligns with the assurances made to members of the Wainuiomata Community throughout the reconsenting process in late-2019.

In preparation for this closure we are currently preparing a discussion document for the consideration of HCC's executive leadership team. Following this review by the ELT a briefing paper will be prepared for Council consideration. This discussion document will outline how cleanfill facilities fit into the waste stream, how the provision of a cleanfill aligns with HCC's other commitments and obligations in the waste, sustainability and development space, and the history surrounding cleanfill deposition within the district (including why HCC has previously made a decision to provide this type of facility). This discussion document will be used to inform a decision about whether Council wish to continue providing a cleanfill facility(s) following the closure of the Wainuiomata site in 2022.

The discussion paper will cover the following;

- HCC obligations and commitments in respect of legislation , regional initiatives and Council's strategic direction
- The benefits and costs of running a cleanfill facility
- A brief history of clean filling in the Hutt Valley
- High level assessment if Council owns a suitable site(s) for a cleanfill operation
- What are the alternatives (for example greater recycling of demolition waste or beneficial use of cleanfill materials)
- Likely costs / returns to Council

We expect to have the discussion document prepared by August. If Council does wish to continue providing a cleanfill facility in the long-term there will then be a subsequent site selection and community consultation process, with opportunities for interested persons to have their say. We would be happy to keep the Wainuiomata Community Board updated in this regard.

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Tonkin+Taylor
105 Carlton Gore Rd, Newmarket, Auckland
www.tonkintaylor.co.nz

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HUTT CITY COUNCIL

CLEANFILL EXTENSION

Location of suitable sites

FIGURE No. Figure 1.

Rev. 0

Euan Kyle

From: Alastair Meehan
Sent: Tuesday, 17 September 2019 6:04 PM
To: Ed Breese
Subject: Summary of long-term planning - is that what Dave was after?

Hi Dave,

As instructed and previously discussed, T+T are undertaking a district-wide search for prospective sites for cleanfilling activities as part of HCC's long-term asset planning. I understand that HCC have received an enquiry about this work, and wanted to provide you with an overview of the methodology (noting that this remains subject to change). We are intending to utilise Geographic Information Systems (GIS) to capture and analyse the required information, and propose the following methodology:

1. Initial population of a long-list for further consideration. This will narrow the search down to properties meeting the following criteria:
    a. HCC owned;
    b. Located within Hutt City's district boundary; and
    c. With an area of 1,000m^2 or greater.
2. We expect this initial list will identify a high number of otherwise unsuitable sites. Accordingly, the second stage will be to discount all sites considered to have fatal impediments to establishing a future cleanfill operation. This list of fatal impediments will be populated in consultation with HCC, however preliminary thoughts are that this may include criteria such as:
    a. Sites listed as reserves or other public spaces;
    b. Sites located within or immediately adjacent to CBD or town centre zones; and
    c. Sites too small to accommodate future use as a cleanfill.
3. Once those sites listed as being otherwise unsuitable in (2) are excluded we expect that a shortlist of potentially suitable properties can be generated. This can then be used to inform Multi-Criteria Analysis (MCA) and community engagement processes, in the aim of arriving at a preferred site for the long-term deposition of cleanfill.

Ngā Mihi | Kind regards,
Alastair Meehan | Planner

Tonkin + Taylor - ***Exceptional thinking together***
Level 4, 2 Hunter Street, Wellington 6011 | PO Box 2083, Wellington, New Zealand
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REPORT

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Document Control

Title: Hutt City's cleanfill demand and future site analysis					
Date	**Version**	**Description**	**Prepared by:**	**Reviewed by:**	**Authorised by:**
August 2020	1.0	Draft report for HCC review	A Meehan	C Purchas	E Breese

Distribution:

Hutt City Council	1 PDF copy
Tonkin & Taylor Ltd (FILE)	1 PDF copy

Table of contents

1 Introduction

1.1 Purpose of this report

The Wainuiomata Cleanfill is the only remaining cleanfill facility within Hutt City's administrative boundaries and therefore plays a key role among Hutt City Council's (HCC) waste assets. It also plays a vital role in the economic development of the City. Operations at this site must cease by 19 June 2022 and a decision is required about whether HCC wish to continue providing this service.

In making this decision, consideration should be given to HCC's lead role in the minimisation of waste generation in the City, and the symbiotic relationship between an operational cleanfill and the re-use and recycling of certain waste materials. This report has therefore been prepared to support HCC's Operational Leadership Team (OLT) in making a decision about the long-term desirability of providing such a facility and how it aligns with Council's wider objectives.

This report has been prepared in accordance with Tonkin & Taylor Ltd's (T+T) letter of engagement dated 6 July 2020 and with our current contract for services dated 30 August 2006.

1.2 What is a cleanfill?

The Ministry for the Environment (MfE) defines cleanfills as "*a low-cost alternative to landfills for inert waste that will have no potentially adverse environmental effect, or only minor effects*". Material deposited into a cleanfill will typically be comprised of construction and demolition (C&D) materials and include soil, rock, concrete, bricks and similar material that will not break down when disposed to ground. This enables operators to accept material without the need for the construction of expensive liners, leachate collection systems, gas collection systems, the collection of waste levies or the associated level of environmental monitoring. In turn, this provides a cost-effective facility for contractors to dispose of suitable material, thereby keeping the cost of development down[1] while also preserving airspace within landfills around the region – thereby extending the operational life of these regionally significant pieces of infrastructure.

1.3 Demand for cleanfill deposition facilities in Hutt City

Development within the Hutt Valley generates substantial volumes of cleanfill material. In the past 3 months alone (May – July 2020) there has been approximately 20,000 m^3 of loose cleanfill material disposed of into the Wainuiomata facility. This material is largely generated locally and originates from construction projects, including:

- The Queensgate Mall redevelopment.
- The Palliser Hotel redevelopment.
- Wainuiomata Mall redevelopment.
- Various residential developments across the city.
- Ongoing roading maintenance activities across the city.

HCC is faced with numerous infrastructure projects in the coming years that could generate and therefore require a facility to dispose of cleanfill. This includes the Eastern Bays cycleway, Naenae Pool redevelopment, Three Waters network renewals and ongoing road maintenance.

In addition to the pipeline of infrastructure projects HCC is faced with growing demand for residential development. It the first three quarters of the 2020/21 financial year HCC had received 1287 building consents with a combined value of $377.7 million – a 49% increase from the previous

[1] For comparison, the Wainuiomata Cleanfill currently charges contractors $12 / cubic metre to dispose cleanfill while the rate for disposing general waste at the Silverstream Landfill is $ $126.50 / tonne (incl. GST).

period. Many of these developments can be reasonably expected to require the ability to dispose of material associated with the site preparation works. The availability of cost-effective deposition facilities to support these developments directly impacts their costs and associated viability, and when the existing Wainuiomata Cleanfill temporarily closed in early-2020 feedback was received from several developers that the increased cost of having to go to Wellington affected the viability of their projects. This preliminary analysis would indicate that demand for cleanfill facilities is expected to continue for the foreseeable future.

Comment [AM1]: Helen,

This is based on my own knowledge of the pipeline & publicly available information. Please review and confirm that this remains a true and accurate reflection of HCCs own expectations.

1.4 Overview of existing HCC cleanfill facilities

HCC currently own a cleanfill facility at 130 Coast Road in Wainuiomata, which is operated under contract by Wainui Cleanfill Ltd. A location plan showing the location of this site is providing in Figure 1 below.

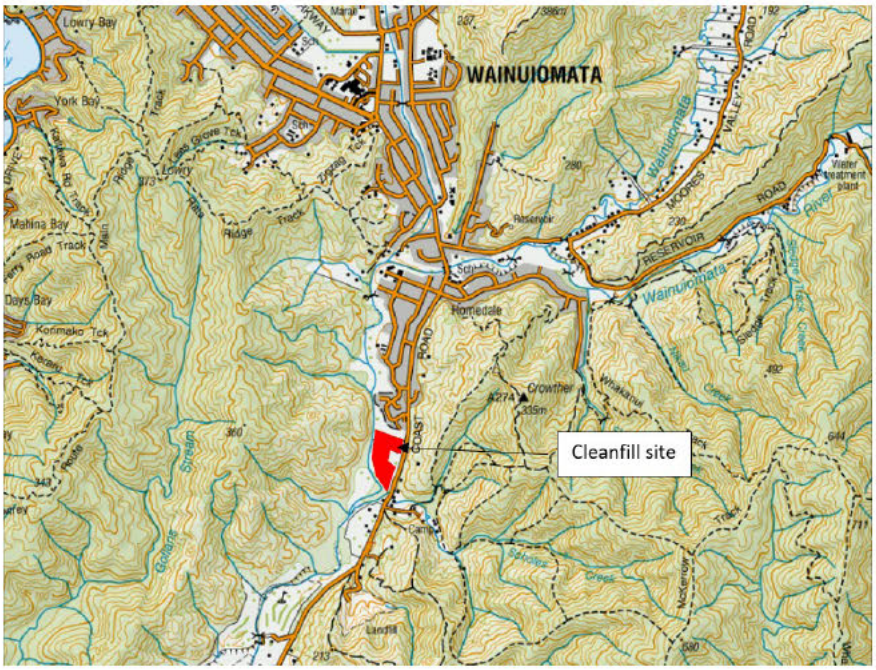

Figure 1: Existing cleanfill site located at 130 Coast Road

The site represents an important piece of waste infrastructure for HCC, and it receives cleanfill material from approved commercial operators across the district (and wider region). It is the only remaining operating cleanfill within the city boundaries and one of only four remaining consented cleanfills within the Wellington Region[2]. We do note that a site in Upper Hutt (at St Pats Silverstream) is being touted for future use as a cleanfill, however no decision has yet been made authorising this use and it is already garnering opposition from local community groups.

The material deposited at Wainuiomata is a by-product of development and supports developers in delivering development projects (including residential development, roading maintenance and other infrastructure upgrades). Approximately 165,000 m^3 of cleanfill has previously been deposited into the site, with a further 117,000 m^3 authorised under the existing resource consent.

[2] The other being the C&D Landfill, T&T Landfill in Wellington City and Waiu Street in Wainuiomata (currently closed). Small scale cleanfills may operate under permitted activity rules in the relevant Regional Plan, however these involve a maximum fill volume of 400 m^3 of material and therefore are unsuited to commercial operation

1.5 History of the Wainuiomata Cleanfill

HCC has been providing a cleanfill facility since 2011 when the facility in Wainuiomata first commenced operating.

HCC initially considered that it could successfully operate the cleanfill site itself by dealing with only a limited number of large contractors with whom HCC had existing relationships. It initially estimated that a 6-year period would be sufficient to fill the site. The rate of filling however was slower than expected and by 2017 the site was only partially full. HCC therefore sought to extend the operational life of the cleanfill facility along with an operational decision to contract the operation of the cleanfill to an independent contractor – Wainui Cleanfill Ltd. In conjunction with significant growth and associated levels of development in Hutt City, this decision has ultimately resulted in a steady increase in filling rates. That increased volume has allowed ongoing improvements to be made on site, including permanent staff on site to enable real time supervision of deliveries to site, improved roading within the site, and installation of a wheel wash. HCC's operational staff consider that this partnership with the site operator along with the site improvements have resulted in an operation that is well-managed and appropriately mitigates the potential for adverse effects while delivering an important asset for HCC and the wider region.

1.6 Environmental impacts of a cleanfill

Cleanfills are required to manage their associated environmental effects under the district and regional planning framework. Under this framework any commercial cleanfill within the HCC administrative boundaries will require resource consent from both HCC and GWRC to operate. This could reasonably be expected to involve the imposition of consent conditions imposing the following type of controls:

- Site operating procedures that can reliably control the material being disposed of (thereby ensuring that only appropriate cleanfill material is accepted);
- Controls to manage the potential for adverse impacts upon water quality (e.g. stormwater controls, soakage pits, perimeter bunding and site stabilisation);
- Controls to manage the discharge of dust (e.g. speed limits, sealing access roads and retaining water sources onsite);
- Controls to manage noise, traffic and the tracking of material onto any nearby roads (e.g. vehicle washes, noise limits and associated monitoring and transportation assessments); and
- Plans to stabilise and remediate the site following completion.

The Wainuiomata Cleanfill is subject to similar such consent conditions and has been subject to regular inspections and site audits since 2011. The site has generally demonstrated a high degree of compliance with consent conditions with complaints or observed non-compliances addressed by the operator (e.g. material tracking onto the road and dust generation). This demonstrates that cleanfill operations, when competently managed, can appropriately mitigate their associated adverse effects while delivering the wider benefits identified above.

1.7 Financial impacts of a cleanfill

The Wainuiomata Cleanfill currently provides HCC with a gross revenue of approximately $400,000 - $500,000 per year. Importantly however, the cleanfill provides wider financial benefits to council in the following ways:

1. Provides a low-cost deposition facility which minimises cost incurred by HCC's operational teams (e.g. roading maintenance contracts).

2. Provision of a low cost and proximate cleanfill facility reduces the propensity for fly-tipping of inert materials that HCC would otherwise pay to uplift and dispose of.
3. Reduces the volume of waste otherwise requiring disposal at Silverstream Landfill. This preserves available airspace in the active waste cell(s) for general waste, which can be charged at a higher rate.

2 HCC's existing waste commitments

HCC is committed to several waste-related initiatives which are outlined below. The continued provision of a cleanfill(s) within HCC's administrative boundaries is considered to align with these commitments for the reasons identified below.

2.1 Wellington Region's Waste Management and Minimisation Plan

The Wellington Regional Waste Management and Minimisation Plan 2017 – 2023 is a joint plan prepared for all territorial authorities in the Wellington Region under the Waste Minimisation Act 2008. The purpose of this plan is to set the strategic priorities and frameworks for managing waste within the region, with a key objective to reduce the amount of waste being disposed of in Class 1 landfills from 600 kg per person per annum to 400 kg per person per annum by 2026.

To achieve this the Waste Management and Minimisation Plan sets a number of objectives, including:

1. To reduce the total quantity of waste to landfill, with an emphasis on wastes that create the most human and environmental harm.
2. To provide environmental, social, economic and cultural benefits by increasing the amount of waste diverted from landfill via reuse, recovery and/or recycling.
3. To investigate the use of available recovery and treatment technologies and service methodologies and apply these where appropriate.
4. To investigate and where appropriate develop partnerships, joint working and co-operation across the private and community sectors as well as territorial and regional councils, including shared services.
5. To work with service providers to identify efficiencies while maintaining or improving service levels.
6. To consider both short and long-term cost impacts of all actions across the community including economic costs and benefits.
7. To consider the environmental impacts of all options and ensure the overall environmental impact is taken into account in decision making.

The provision of a viable cleanfill(s) within a region is considered to either directly or indirectly support those objectives by:

1. Directly reducing the volumes of waste material that would otherwise be disposed to landfill or unauthorised tip sites.
2. Supporting the future provision of a resource recovery facility (as discussed in Section 4 below).
3. Providing a cost-effective facility for service providers (including property developers, infrastructure providers and maintenance contractors) to dispose of suitable inert material and thereby reduce development costs.
4. Extending the life of the region's other landfills (including Silverstream) by diverting suitable material from those sites.

2.2 Regional Policy Statement for the Wellington Region

The Regional Policy Statement (RPS) sets a specific objective (Objective 11) and policy (Policy 65) promoting the reduction of waste going to landfills. Objective 11 states that the *quantity of waste disposed of is reduced* while Policy 65 promotes the reduction, reuse, and recycling of waste.

Cleanfills are specifically identified as one method of diverting otherwise clean and inert material from the waste-stream to assist with achieving this objective and policy.

2.3 HCC's Environmental Sustainability Strategy 2015 - 2045

HCC's Environmental Sustainability Strategy sets a vision for *a thriving environment, now and into the future* and identifies a series of goals to achieve this. One of these goals is for HCC to demonstrate leadership in environmental stewardship and sustainability, with one measure of success being that *council manages waste activities to best practice to maximise recycling and diversion from landfill*.

Cleanfills are recognised across NZ as a best practice approach to diverting otherwise non recoverable inert material from Class 1 landfill. The provision of a cleanfill(s) will continue to be required to complement any future provision of a resource recycling and recovery facility (as outlined in Section 4 of this report).

2.4 HCC's Infrastructure Strategy 2018 - 2048

HCC's Infrastructure Strategy sets a vision for *infrastructure that meets the needs of today and tomorrow*. This vision is underpinned by a series of goals relating to improved resilience and capacity of existing networks and recognises several key infrastructure related projects including three water network renewals, road network improvement works, shared path and cycleway developments. This is in addition to those works recently announced as part of the Government's shovel ready programme of works. Infrastructure projects have the potential to generate cleanfill material requiring disposal and have historically been the source of substantial volumes of spoil material disposed of into the Wainuiomata facility (e.g. the Wainuiomata Shared Path and works upon the roading network).

This strategy recognises that the substantial capital and operational expenditures associated with the development, upgrade and maintenance of infrastructure represents a key constraint to the delivery of these projects. The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments.

2.5 HCC's Urban Growth Strategy 2012 – 2032

HCC's Urban Growth Strategy sets out the long-term approach to managing growth and change for Hutt City. This strategy identifies that much of the cost to HCC associated with the provision of new greenfield infrastructure will be associated with the development of new infrastructure. We also note that while land development costs for both brownfield and greenfield development will be borne by future developers, these will have a direct impact upon the cost of developing within the Hutt Valley (and therefore upon market costs).

The provision of a council-controlled cleanfill facility provides HCC with the opportunity to reduce and in some cases offset the costs associated with the disposal of material arising from council infrastructure developments. It also incentivises developers to do business within the city by providing a cost-effective disposal facility.

2.6 Construction Waste Bylaw

TBC

Comment [AM2]: Jörn,

I understand that this is currently out for consultation. Did you want to include commentary here? I note it probably ties in well with the discussion in Section 3 below.

3 Opportunities for further waste minimisation

Due to their low cost cleanfills have historically been viewed as a popular facility to divert materials away from landfills. While this remains a desirable outcome, we note that there is an increasing focus on the recovery of materials from C&D activities (e.g. demolition timber, reusable building materials, concrete and steel). This focus stems from the fact that C&D waste remains a high-volume waste stream within the Wellington Region.

A 2018 report prepared for the Wellington Regions *Waste Management and Minimisation Plan (WMMP) Working Group*[3] identified the creation of additional processing capability as having the highest potential to reduce the amount of material disposed of at Class 1 Landfills. This directly supports the objectives of the Waste Management and Minimisation Plan (identified in Section 3.1 above) and HCC officers have expressed an interest in providing facilities to enable an enhanced level of material recovery within Hutt City. An overview of these type of facilities is provided below, and we note that this type of facility is considered complementary to the provision of a cleanfill in the long term.

3.1 C&D waste resource recovery

As noted previously, the Regional Waste Minimisation and Management Plan working group have identified potential to actively target C&D waste for enhanced resource recovery. The group are considering further work to develop one or more resource recovery facilities in the region.

Council is also developing proposals for upgrading the transfer station at Silverstream Landfill including a new resource recovery area. This area is suitable for domestic and small commercial materials i.e. any resource recovery target C&D waste or other materials will need to take place elsewhere.

A typical C&D resource recovery operation may include:

- Separation of concrete and other suitable rubble for processing into 'recycled aggregate' (see Section 3.2).
- Removal and processing of native timber (de-nailing, re-dressing)
- Removal of recyclable materials
  - Metals (components, piping, packaging) for recycling
  - Cardboard (clean, suitable for recycling)
  - Plastics (specific materials with viable markets)
  - Building components that are suitable for re-use
  - Flat glass - for crushing as aggregate/sand, or as feedstock for fibreglass manufacturing
- Separation of materials suitable for cleanfill
- Consolidation of remaining material for disposal at an approruately consented Class 1 Landfill or Class 2 Managed Landfill.

An operation of this type in the Hutt Valley will require a suitable location with many of the location characteristics being similar to those for a cleanfill. Example characteristics include

- Good transport links
- Suitable zoning (industrial or commercial/rural)
- Supportive or involved landowner.

[3] Titled *Regional C&D Waste Issues and Options Paper*, dated October 2018

3.2 Concrete crushing and recycling

A reasonable volume of material disposed of to cleanfill and landfills within the Wellington Region includes concrete from demolition sites. HCC officers have identified an opportunity for Council to establish a facility that crushes and screens this concrete for use as aggregate on cycleways, driveways and other construction projects. This would provide a recovered source of construction material and reduce the waste diverted into landfill or cleanfills.

We consider that a facility for the crushing of concrete and subsequent resale as aggregate could feasibly complement operations at a future cleanfill – subject to identification of a site which can accommodate both activities. Should HCC choose to continue providing a cleanfill facility we expect this will form part of the site selection criteria.

Comment [AM3]: Dave,

I know you consider this as presenting a substantial opportunity. Please review and let me know if you'd like changes / additions.

4 Future cleanfill sites

HCC officers expect that the existing Wainuiomata Cleanfill will cease operation no later than 19 June 2022. Should HCC determine that the continued provision of a cleanfill facility is desirable in the long-term we expect that a detailed site selection process would be required - including Multi-Criteria Analysis (MCA) and public consultation.

To inform the initial decision from HCC (as to whether the continued provision of a cleanfill is desirable) an initial desktop analysis has been undertaken. The purpose of this is to determine whether there are any potentially suitable sites to warrant further assessment.

4.1 Preliminary site criteria

This initial desktop analysis sought to identify any site that could feasibly lend itself to cleanfill operations within the next 18 months. We have assumed that the minimum criteria required to achieve this would require a site with the following criteria:

- HCC owned;
- A minimum site size of 1,000 m^2; and
- Within HCC's administrative boundaries.

A GIS analysis based upon these criteria have returned 217 sites for further investigation – as shown in **Appendix A** to this report. We acknowledge that many of these sites will be unsuitable for the establishment of a cleanfill facility and expect these sites would be further refined through a subsequent shortlisting process. The desire of this initial process was to ensure that no potentially suitable site was excluded, while still reducing the number of prospective sites to a manageable level for further analysis.

In addition, HCC staff have previously received enquiries from various parties about the viability of certain sites for future cleanfill operations, most of which currently meet the above criteria while one does not (due to being owned privately). This includes:

- The Silverstream Landfill;
- The Closed Wainuiomata Landfill;
- The Closed Waiu Street Cleanfill (privately owned);
- The Old Wingate Landfill; and
- An industrial site located in Seaview (next to the Waste Water Treatment Plant).

No decision to include or exclude these sites from a shortlist has yet been made, however they have been included in this report in the effort of completeness. We do note that some members of the Wainuiomata Cleanfill's Community Liaison Group (CLG) have repeatably expressed a view that no further cleanfill facility should be located within Wainuiomata.

4.2 Site selection process

Should HCC wish to further advance the search for a new cleanfill facility we recommend further refining the site selection criteria to enable the formation of a shortlist. This would exclude those sites deemed unsuitable for the future operation of a cleanfill (fatal flaws analysis). Refining this criterion would be undertaken in partnership with HCC officers and the site operator and could result in the exclusion of sites:

- Without adequate vehicle access; or
- Located within residential or commercially zoned areas; or

- With a topographic profile unsuited to bulk filling; or
- Subject to specified District Plan or Regional Plan overlays; or
- Any other agreed criteria

Comment [AM4]: Helen, Dave and Jörn,

I expect we will need broad input to ensure we get robust site selection criteria. This may require input from others within HCC (i.e. economic development, roading and maintenance etc). Something to consider.

5 Next steps

The purpose of this report was to provide HCC's OLT with information to support making a decision about whether HCC wish to continue providing such a facility. If HCC do wish to continue providing such a facility we expect the following next steps will be required:

1. Establish the type of service HCC wishes to establish (e.g. Cleanfill and demolition recycling facility);
2. Establish a shortlist of sites based upon agreed site criteria;
3. Get Council endorsement;
4. Undertake community consultation, seeking community views of the respective shortlisted sites;
5. Undertake a Multi-Criteria Analysis (MCA) scoring of the shortlisted sites to identify a preferred site(s);
6. Undertake site investigations to confirm suitability of the preferred site(s);
7. Prepare and obtain the necessary suite of resource consents to authorise operations;
8. Undertake any necessary site improvements; and
9. Commence cleanfill operations.

Comment [AM5]: Helen,

Are you aware whether HCC will have any specific consultation requirements based on LGA processes? I also expect that we would need to align with any strategy / expectations held by council.

6 Applicability

This report has been prepared for the exclusive use of our client Hutt City Council, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

Tonkin & Taylor Ltd

Report prepared by:	Authorised for Tonkin & Taylor Ltd:
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Appendix A: Long list of prospective sites

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