

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under s149J of the Resource Management Act 1991 to consider Notice of Requirements and applications for Resource Consent made by the New Zealand Transport Agency in relation to the East West Link roading proposal in Auckland.

**SUMMARY OF EVIDENCE OF SIMONNE ELDRIDGE ON BEHALF OF AUCKLAND
COUNCIL
CLOSED LANDFILLS**

Corrections to Evidence

1. As outlined in the Joint Witness Statement dated 25 May 2017, I have made some minor clarifications to terminology used in my evidence dated 10 May 2017, namely:
 - (a) Paragraphs 5.6 and 5.7 should read 'is bounded by basalt' rather than 'represents the edge of basalt'.
 - (b) Reference in Paragraphs 7.12 (c) and (d) to slope instability relates to potential instability during construction rather than large scale slope movement.

Overview of Key Conclusions of Evidence

2. My evidence relates to the effects of the Proposal on Council's ability to comply with the requirements of discharge consents held for the closed landfills impacted by the Proposal and Council's ability to respond to landfill related risks in the future.
3. In my evidence I provide a summary of the history of each of the sites managed by the Closed Landfill and Contaminated Land Response Team (CLCLR) on behalf of Council, namely: Gloucester Park (an area of uncontrolled fill), Galway Street Closed Landfill, Waikaraka Park Closed Landfill, Pikes Point West Closed Landfill and Pikes Point East Closed Landfill.
4. To my knowledge the discharges from the closed landfills are currently generally compliant with the discharge consents held by Council. With regard to leachate management, this includes the collection of leachate from the Pikes Point East and Pikes Point West Closed Landfills and discharge to trade waste, routine site inspections for leachate seeps, and routine monitoring of leachate quality.
5. I consider that the potential effects of the Proposal on the closed landfills requires careful consideration and management throughout the detailed design and construction of the Proposal. However, I am of the opinion that these effects can be adequately managed through the enforcement of well-crafted consent conditions.

Summary of Issues Resolved and Unresolved

6. In my evidence dated 25 May 2017 and my rebuttal dated 20 June 2017 I proposed a number of amendments to the conditions proposed by the Applicant.

The Applicant subsequently proposed amended conditions on 20 June 2017¹. I am also aware that there have been subsequent discussions between the Applicant and Council's Planning Experts with regard to the wording of the conditions.

7. In summary, I am generally in agreement that the consent conditions dated 20 June 2017 will enable the effects of the Proposal in relation to the closed landfills to be adequately managed. It is my understanding that there is only one outstanding item which relates to the monitoring of discharges from the waste encapsulated within the road embankment. I have recently commented on proposed wording to that condition. I anticipate that the dialogue will continue on this issue as the hearing progresses.

Matters Raised by the Board of Inquiry

8. In response to Board Minute and Direction 20, dated 4 July 2017, the closed landfill expert conferencing was reconvened on 11 July 2017. I attended, together with experts from the Applicant and Envirowaste Services Ltd. As outlined in the Joint Witness Statement, the primary topic of discussion was the technical requirements for the extent of designation on the ChemWaste site and how that might be impacted by the form of the leachate infrastructure. At this meeting there were no points of disagreement and it was agreed that:
- (a) The leachate infrastructure does not determine the extent of the designation within the ChemWaste site.
 - (b) The designation refinements tabled at the meeting by NZTA experts reduced the extent of the encroachment onto the Chemwaste site.
9. In response to questions from the Board on 18 July 2017 the Applicant's Contaminated Land Expert, Dr Wallis suggested that there may be some benefit in dividing up the Contaminated Land Management Plan (CLMP) required under condition CL.1 to facilitate its progressive implementation. In my opinion, there would be considerable benefit if a separate CLMP was prepared for Sector 2, (i.e. the Onehunga Foreshore) given the closed landfill specific measures that need to be adopted to ensure no uncontrolled discharges from the closed landfills. This requirement could be reflected by a minor adjustment to the wording of condition CL.1.

¹ Attached to the Rebuttal Evidence of Ms Hopkins dated 20 June 2017