

**BEFORE A BOARD OF INQUIRY
NORTHERN CORRIDOR PROPOSAL**

UNDER of the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER of notices of requirement for designation and resource consent applications by the New Zealand Transport Agency for the Northern Corridor Proposal (the **Proposal**)

**SUMMARY OF ROSEDALE CLOSED LANDFILL EVIDENCE OF SIMONNE
FRANCES ELDRIDGE
24 July 2017**



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1. My name is Simonne Frances Eldridge. I am the Sector Director – Energy | Industry | Waste for Tonkin & Taylor Ltd (**T+T**). My background and experience are set out in section 1 of my evidence.
2. My evidence relates to the potential effects of the Proposal on the Rosedale Closed Landfill (**the Landfill**) and how these impacts are best mitigated to minimise the risk of uncontrolled discharges to the environment. Currently the Landfill and its potential adverse effects on the environment are managed in accordance with discharge consents held by Auckland Council. With this in mind I have also considered how the Proposal may affect the Council's ability to comply with the conditions of those discharge consents.
3. To my knowledge, the discharges from the Landfill are currently generally compliant with the discharge consents held by Council.
4. I consider that the potential effects of the Proposal on the Landfill require 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.
5. In my evidence dated 25 May 2017 I proposed a number of aspects that needed to be reflected in revisions to the conditions proposed by the Applicant. These aspects were discussed at length during the expert conferencing on landfill issues which I attended. The resulting signed joint witness statement (**JWS**) dated 20 June 2017 reflects proposed changes to the conditions that were agreed between landfill experts as part of that process.
6. I subsequently attended part of the expert conferencing on planning issues on 6 July 2017, where further condition amendments were discussed and agreed and reflected in the signed JWS.
7. I understand that subsequently to the discussion of 6 July 2017, which Mr McGarr attended and is a signatory to the JWS, Mr McGarr has provided further advice to the Board on the Landfill Conditions¹ including some amendments to conditions attached to the 6 July 2017 JWS.
8. I have discussed these proposed amendments with Mr Amputch, the Applicant's Landfill expert.

¹ Technical Advice: Conditions (landfill), Craig McGarr, 14 July 2017

9. I consider the amendments proposed by Mr McGarr to conditions LW.1E and LW.6 provide further clarity. However, I would prefer “to ensure” to be replaced with “to document how” in condition LW.1B as this condition relates to the Landfill Management Strategy (**LMS**) and I consider that a strategy does not ensure compliance with consents but rather the implementation of a well-considered strategy is how that is achieved.
10. I do not support the inclusion of condition LW.1F and the corresponding rewording of LW.4j. In my experience, trigger values are directly linked to site specific considerations including the activity being undertaken and the consequence of breach and are best developed as part of a site specific risk assessment. Landfill gas is typically monitored for environmental compliance (ie monitoring of off-site discharges) and for health and safety of workers and others. In this case, as the LMS is required by resource consent conditions, I consider the intent of the monitoring within the LMS is to monitor for off-site discharges. Although I consider, health and safety considerations for workers are better addressed under the relevant health and safety legislation, I have no objection to the previously proposed condition LW.5 which requires the consent holder to prepare a health and safety plan.
11. I understand from discussions with Mr Amputch that he has proposed an alternative to LW.1F. I support the intent of Mr Amputch’s revision and consider that a more robust approach would be to modify LW.5 to reflect the need for a site specific risk assessment to inform the health and safety plan requirements.
12. I support changing “ensure” to “undertake” and “strategy” to “LMS” in LW.10. However, I do not support the change to LW.10 to only refer to landfill gas monitoring as, in my experience, a suitable monitoring programme for works within a closed landfill is not limited to requirements for landfill gas monitoring. For example, as outlined in Paragraph 8.3 (a) of my evidence, the existing landfill consents require surface water and groundwater monitoring in addition to various forms of landfill gas monitoring,
13. Consequently, I agree that the rewording of the beginning of condition LW.4j (ie “Methods for undertaking”) I do not support the cross reference to LW.10.

Dated at Auckland this 24th day of July 2017



Simonne Frances Eldridge