

**BEFORE THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN  
HEARINGS PANEL**

**IN THE MATTER** of the Resource Management Act 1991 and the Canterbury  
Earthquake (Christchurch Replacement District Plan) Order  
2014

**AND** the Christchurch Replacement District Plan

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**THIRD STATEMENT OF EVIDENCE OF NARDIA ALICE NANETTE YOZIN  
ON BEHALF OF THE CROWN (SUBMITTER 495, 2387 and 3271)**

**PROPOSAL 21.12: SPECIFIC PURPOSE (BURWOOD LANDFILL AND  
RESOURCE RECOVERY PARK) ZONE**

Dated the 24<sup>th</sup> day of November 2015

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## 1. INTRODUCTION

- 1.1 My name is Nardia Alice Nanette Yoizin. I hold the position of Advisor, Planning at the Canterbury Earthquake Recovery Authority ("**CERA**"). I have been in this position since December 2013.
- 1.2 This is the third statement of evidence I have prepared for the Christchurch Replacement District Plan ("**Replacement Plan**"). My first statement of evidence related to the hearing for the Stage 1 and 2 notified provisions for the Hazardous Substances and Contaminated Land Proposal.<sup>1</sup> My second statement of evidence related to the hearing for the Stage 3 Utilities and Energy Proposal.<sup>2</sup>
- 1.3 Rather than repeating that evidence, I adopt that evidence as necessary for the purposes of this statement of evidence. A summary of my qualifications and relevant past experience is provided at paragraph 1.2 of my first statement of evidence.
- 1.4 I have been engaged by the Crown, through CERA, to provide planning evidence in relation to the Crown's submission and further submission on the Stage 3 notification of the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone Proposal ("**Proposal 21.12**").
- 1.5 I have been advising the Crown on planning matters relating to the Burwood Landfill and Resource Recovery Park since mid-2015. This has included advising on:
- (a) the Ministers' Comments and Crown Submissions on the Stage 2 Open Space Proposal (in which the Burwood Landfill and the Burwood Resource Recovery Park ("**BRRP**") were originally notified);
  - (b) the Stage 3 Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone Proposal; and
  - (c) the ongoing operation and future options for the Burwood Landfill and the BRRP, which has included:
    - (i) advice on the implementation and transitional needs (if any) of the Canterbury Earthquake (Resource Management Act -

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<sup>1</sup> Available at <http://www.chchplan.ihp.govt.nz/hearing/chapter-12-hazardous-substances-and-contaminated-land-deferred-to-stage-2/> under "*Submitter Evidence*".

<sup>2</sup> Available at <http://www.chchplan.ihp.govt.nz/hearing/chapter-11-utilities-and-energy-part-stage-3/> under "*Submitter Evidence*".

Burwood Resource Recovery Park) Order 2011 ("**BRRP Order**");  
and

- (ii) advice on behalf of CERA on provisions in the Canterbury Land and Water Regional Plan ("**LWRP**") and the Land Use Recovery Plan, Te Mahere Whakahaumanu Tāone ("**LURP**") Actions enabling the continued operation of the BRRP.

1.6 Prior to the notification of Proposal 21.12, on behalf of the Crown I assisted the Christchurch City Council ("**Council**") with the drafting of the notified provisions and section 32 analysis. The Crown's Stage 2 submission expressed concerns about the Open Space Natural zoning proposed for the Burwood Landfill and BRRP and the lack of an associated objective, policy and rule framework to support the activities that occur on that site. It sought that the Burwood Landfill and BRRP Park be zoned Specific Purpose (Burwood Landfill and Resource Recovery Park).<sup>3</sup> In response, the Council:

- (a) re-notified the Burwood Landfill and Burwood Resource Recovery Park as a Specific Purpose Zone, so that the existing activities could be provided for as part of the planning framework in the Replacement Plan; and
- (b) worked together with the Crown on drafting the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone proposal and section 32 report.

1.7 This collaborative approach has limited the issues in dispute at the time of notification. As more fully detailed in Attachment B, the Crown's submission sought the following key amendments to Proposal 21.12:

- (a) add a new objective 21.12.1.x which recognises the importance of the Recovery Park and Landfill in facilitating the continued recovery of Christchurch and the disposal of earthquake waste;
- (b) amend policy 21.12.1.1.1 to provide flexibility for operations across the zone to continue as needed to assist with recovery;
- (c) include currently consented Site D as a location where earthquake waste storage and processing can occur as a permitted activity;

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<sup>3</sup> See eg Crown's Stage 2 submission paragraph 22.3.

- (d) create new permitted activity standards to enable necessary general operational activities, the erection of buildings and rehabilitation of the entire Zone to provide certainty and to reduce unnecessary duplication; and
- (e) improve the clarity of specific standards, the appendices and Planning Map 20 (together, the "**Crown submission points**").<sup>4</sup>

## **2. CODE OF CONDUCT**

- 2.1 I confirm that I have read the Code of Conduct for expert witnesses as contained in the Environment Court's Practice Note 2014. I have complied with the practice note when preparing my written statement of evidence, and will do so when I give oral evidence before the hearings panel.
- 2.2 While I am employed by CERA, my employer and I recognise my overriding obligation to the Hearings Panel in presenting my evidence. CERA has agreed to me giving expert evidence on its behalf in accordance with my duties under the Code of Conduct.
- 2.3 The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in the evidence to follow.
- 2.4 Unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## **3. SCOPE**

- 3.1 I have been asked to provide planning evidence in relation to Proposal 21.12.
- 3.2 My evidence is structured as follows:
  - (a) "*Context of BRRP and Burwood Landfill Development*" provides context to the Ministerial intervention that established the BRRP under the BRRP Order, and describes why the Burwood Landfill was reopened, accepting earthquake waste resulting from the Canterbury earthquakes in 2010 and 2011;

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<sup>4</sup> In its further submission the Crown supported two submissions made by the Council: adding a new permitted activity and amendment to Rule 21.12.2.2.1.

- (b) "*Site D - Coronial Materials*" provides context around Site D contained in the proposed zone, and what planning framework is required to provide for the needs of the material within site D; and
- (c) "*Agreed Proposal*" discusses the agreed changes to Proposal 21.12 as set out in the updated redline version of Proposal 21.12 which was finalised following mediation on 17 November 2015 ("**Agreed Proposal**").

3.3 A list of documents and evidence I have drawn upon in forming my views is set out in **Attachment A** to this evidence. Included in this list is the evidence given by Mr Clark in respect of Proposal 21.12. I rely on the evidence of Mr Clark for the volumes of earthquake waste needing to be sent to the BRRP for processing, and to the Burwood Landfill for permanent disposal.

3.4 I have also reviewed the draft evidence of Mr Daniel Murray and Mr Gareth James for the Burwood Resource Recovery Park in relation to Proposal 21.12.

3.5 I attended informal mediation for the Crown on 4 November 2015 and formal mediation for the Crown on 17 November 2015.

3.6 I have compiled in **Attachment B** to this evidence a table of submission points raised by Crown on Proposal 21.12, and how they have been resolved.

#### **4. EXECUTIVE SUMMARY**

4.1 The BRRP was established and the Burwood Landfill was reopened following the Canterbury earthquakes. It was necessary for recovery that appropriate resource recovery and disposal facilities were available to process and dispose of earthquake waste resulting from the demolition of earthquake damaged buildings. A streamlined consent process for BRRP and Burwood Landfill was established in recognition of the critical importance of earthquake waste processing and disposal to the recovery of Christchurch.

4.2 To continue to provide for recovery, the BRRP and Burwood Landfill need to be given flexibility within the planning framework to allow continued receipt of receive earthquake waste as necessary and for the existing processing, stockpiling and disposal activities. I agree with the Crown's submission that the original justification for the establishment/reopening of these two facilities (that they are necessary for and efficient and cost effective recovery) remains

relevant as the volume of earthquake waste needing to be processed has exceeded original volume projections and, as set out in the evidence of Mr Clark<sup>5</sup> and Mr James,<sup>6</sup> there are still significant volumes of earthquake waste to be processed.

- 4.3 In my opinion the Agreed Proposal is the most appropriate way to achieve the purpose of the Resource Management Act 1991 ("**RMA**"), meets the requirements of the higher order planning documents, has particular regard to the Statement of Expectations and will implement the objectives in the Strategic Directions Chapter, as further discussed in section 7 below.

## **5. CONTEXT OF BRRP AND BURWOOD LANDFILL DEVELOPMENT**

### **BRRP establishment**

- 5.1 Following the Canterbury earthquakes in 2010 and 2011 it was clear that:
- (a) a large volume of earthquake waste resulted from the damage and subsequent demolition of buildings and infrastructure resulting from the earthquakes (estimated at the time to be up to 750,000 tonnes);
  - (b) Christchurch City did not have an accessible waste processing facility within a close proximity to the source of the waste (Port Hills, Flat Land and Central City), that also had the capacity to process the waste and recycle any re-useable materials; and
  - (c) it was necessary to process the earthquake waste at a site which was accessible to the city, to reduce transport movements and increase efficiency in removing earthquake waste material out of damaged areas to enable rebuild and recovery to occur more effectively.
- 5.2 The BRRP was established in Bottle Lake Forest, initially under emergency provisions by the Civil Defence National Controller, to receive this earthquake waste and to allow for further sorting<sup>7</sup> and recycling.
- 5.3 In July 2011 the BRRP Order was made under section 71 of the Canterbury Earthquake Recovery Act 2011 ("**CER Act**"). The BRRP Order required the facility to obtain resource consents from the Canterbury Regional Council and the Council. The BRRP Order set up a streamlined process with limited

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<sup>5</sup> Evidence of Mr Mathew Clark, dated 24 November 2015, paragraph 4.2.

<sup>6</sup> Draft evidence of Mr Gareth James, paragraphs 39 and 41.

<sup>7</sup> A portion of the materials can be salvaged at the source of the demolition.

notified for the consent applications required to establish and operate the BRRP. In particular, its effect is that:

- (a) earthquake waste processing activities for which land use consent from the Council is sought are controlled activities;
- (b) earthquake waste processing activities for which discharge consent from the Canterbury Regional Council is sought (under the Canterbury Natural Resources Regional Plan ("**NRRP**")) are discretionary activities;
- (c) applications lodged under the Order must not be publicly notified or given limited notification; and
- (d) a limited list of persons must be invited to comment on consent applications under the Order.

5.4 The consents for the BRRP were granted in September 2012.

5.5 However, after being processed at the BRRP there remains a portion of earthquake waste which requires permanent disposal. The streamlined consenting process for "earthquake waste processing activities" under the BRRP Order excludes the permanent storage or disposal of earthquake waste.<sup>8</sup> Such disposal is consented through amended rules in the district and regional plans which I discuss below.

### **Re-opening the Burwood Landfill**

5.6 To aid efficient recovery CERA, the Council and the Canterbury Regional Council identified the Burwood Landfill as an appropriate location to dispose of the earthquake waste which was in a close proximity to the source of the waste, enabling the efficient and cost-effectively removal of waste.

5.7 The Kate Valley Landfill, located in the Hurunui Region (approximately 70km from Christchurch CBD), was established in 2005 as the main landfill for the Canterbury region's waste. The landfill was designed to provide for waste disposal facilities for the region for the next 35 years, and accept between 10-20,000 tonnes of waste per year. Kate Valley, is owned by the Council, Hurunui District Council, Waimakariri District Council Selwyn District Council, Ashburton District Council and Canterbury Waste Service Limited.

5.8 Prior to the earthquakes, the Kate Valley Landfill received the Council's municipal waste. However, the volume of earthquake waste resulting from

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<sup>8</sup> Under the definition of "earthquake waste processing activities" in clause 4 of the Order.

demotions that would need to be disposed of was estimated in 2011 to be approximately 750,000 tonnes. Sending the earthquake waste to Kate Valley would significantly reduce the life of that landfill and would also be inefficient due to its location over 70kms from the source of the material. In addition, Kate Valley has a limited capacity for daily intake of waste,<sup>9</sup> which would be exceeded if earthquake waste was to be disposed in the Kate Valley Landfill.

5.9 The Burwood Landfill was the Council's main municipal landfill up until 2005, when it closed following the opening of Kate Valley Landfill. The Burwood Landfill is located in Bottle Lake Forest approximately 10km from the Christchurch CBD.

5.10 It was necessary to find an appropriate location, within a close proximity of the Christchurch CBD, to dispose of the large volume of earthquake waste resulting for the demolition of damaged buildings and infrastructure. The Council determined, that the Burwood Landfill, could be reopened, and new disposal cells constructed to provide a disposal site for earthquake waste.

5.11 The advantages of reopening the Burwood Landfill included:

- (a) its close proximity to the source of the waste (10km from the CBD);
- (b) the fact that it was an existing landfill;
- (c) its distance of several hundred metres away from the nearest residents and within Bottle Lake Forest, which provides additional amenity screening; and
- (d) that it had sufficient space to allow for waste processing activities to be undertaken, to try and recover as much material as possible from the earthquake waste.

5.12 In order to reopen the Burwood Landfill, amendments needed to be made to the City Plan and the NRRP to provide for disposal of waste on the site. These amendments were in addition to those made through the BRRP Order and were needed to provide for landfill activities through a streamlined consenting process for the consent applications.

5.13 In November 2011 the Minister for Canterbury Earthquake Recovery amended the NRRP and the City Plan using section 27 of the CER Act to allow the Burwood Landfill to be used as a permanent disposal facility for

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<sup>9</sup> This is explained further in the draft evidence of Mr Gareth James for the Burwood Resource Recovery Park at paragraphs 47-60.

earthquake waste. These amendments provided a number of permitted activity standards for the Burwood Landfill, and where these permitted activity standards were not met, the status of the landfill activities would require controlled activity consent on a non-notified basis.

- 5.14 As part of these amendments, a specified number of individuals or groups could provide written comment on any consent application applied for under the new rules. The Council obtained consent for the Burwood Landfill in September 2012.

### **Implementation issues**

- 5.15 The BRRP Order expires with the expiry of the CER Act in April 2016. Although consents granted under the BRRP Order will continue to remain in force until their expiry, any new consent applied for after April 2016 will be subject to the specific zone rules relevant to the BRRP and the Burwood Landfill. As such, to provide for continued recovery, it is necessary that the existing activities at the BRRP and Burwood Landfill are incorporated into the planning framework in the Replacement Plan.
- 5.16 The amendments made to the NRRP were also inserted into the LWRP as part of LURP Action 46.<sup>10</sup> This results in the planning framework in the LWRP providing for the existing disposal activities at the Burwood Landfill to continue as permitted activities.
- 5.17 In June 2015, it became apparent that the original estimated volume of earthquake waste needing to process at the BRRP and disposed of in the Burwood Landfill would be exceeded. This is because the volume of earthquake waste was much larger than originally anticipated.<sup>11</sup> An investigation of the various options to extend the landfill cells to accommodate the increased volume of waste was undertaken by the BRRP operator. This investigation identified the site on which the BRRP is located (Site B) as a potential disposal area.<sup>12</sup>

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<sup>10</sup> Action 46 provides: "Environment Canterbury is directed, pursuant to section 23(1)(c) of the CER Act, to make any changes or variations to objectives, policies and methods in the Regional Policy Statement and regional plans [...] that it considers are appropriate to enable and support recovery and rebuilding in accordance with the Recovery Plan."

<sup>11</sup> Draft evidence of Mr Gareth James, paragraph 20.

<sup>12</sup> Draft evidence of Mr Daniel Murray, paragraph 31.

- 5.18 As disposing of earthquake waste is a prohibited activity in the LWRP, the BRRP Operator sought, through the LURP review,<sup>13</sup> that Site B be included in the permitted area of earthquake waste disposal.
- 5.19 The Canterbury Regional Council has made recommend to the Minister as a result of the LURP review. One recommendation is that the LWRP be amended so that earthquake waste disposal in Site B of the BRRP would become a permitted activity. This matter is with the Minister for consideration.

## **6. SITE D - CORONIAL MATERIALS**

- 6.1 During the Canterbury earthquakes a number of buildings were destroyed or damaged and loss of life occurred. For these buildings, it was necessary to take the building material and store it until a coroner's investigation was complete.
- 6.2 Material from these buildings was taken to the BRRP and Burwood Landfill, but stored on a separate site (Site D), away from processing and disposal activities.
- 6.3 The material was consented to be temporary stored while the coroner's investigation was carried out.
- 6.4 The Crown's submission sought that Site D be included in the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone. This inclusion in the zone will provide permitted activity status for the continued storage of this material, until such time as final decisions are made about this material, considering its sensitive nature.
- 6.5 The provisions contained in the redline version attached to the evidence of Ms Rolton<sup>14</sup> include site D in the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone. This is through the permitted activity standards in 21.12.2.2.1 (P2) as the temporary storage of earthquake waste is included in the definition of 'earthquake waste processing'. The Crown supports these provisions.

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<sup>13</sup> Section 5.4, page 43 of the LURP sets out that a review will be undertaken.

<sup>14</sup> Evidence of Ms Kimberley Rolton, dated 12 November 2015, paragraph 9.27.

## 7. AGREED PROPOSAL

- 7.1 The Crown's submission points were resolved through ongoing discussion with the Council, as reflected in the revised version of Proposal 21.12 appended to Ms Rolton's evidence in chief. As detailed further in my submissions table in Appendix B, I agree with Ms Rolton's reasons for the changes from the notified provisions.<sup>15</sup> In particular:
- (a) the amendment to Objective 21.12.1.1 which recognises the importance of the BRRP and Landfill to recovery;
  - (b) the amendment to Policy 21.12.1.1.1 which seeks flexibility around the permanent disposal locations within the proposed zone to accommodate the larger volumes of earthquake waste than what was originally expected;
  - (c) the restructuring of 21.12.2.2.1 (P1), (P2) which improves clarity and ease of use;
  - (d) the addition of 21.12.2.2.1 (P3), (P4) and (P5) which provided permitted activity standards for specific activities within the zone; and
  - (e) clarification of the specific parties who can provide written comments on any controlled activity application.
- 7.2 The further changes agreed through mediation largely addressed the BRRP Operator's submission points. I also support these further changes as they also achieve the outcomes expressed in the Crown's submission, which I support.
- 7.3 The Agreed Proposal provides for the continuation of the following existing activities:
- (a) earthquake waste processing at the Burwood Resource Recovery Park;
  - (b) temporary storage of earthquake waste within the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone; and
  - (c) the permanent disposal of earthquake waste within the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.

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<sup>15</sup> Evidence of Ms Kimberley Rolton, dated 12 November 2015, paragraphs 8.1, 8.4, 8.5, 9.8, 9.24, 9.25, 9.26, 9.27, 9.31, 9.32, 10.1, 10.2, 11.2 and 12.1.

- 7.4 I consider that the provisions in the Agreed Proposal are the most appropriate way to achieve the purpose of the RMA, meet the requirements of the higher order planning documents, have particular regard to the Statement of Expectations and implement the objectives in the Strategic Directions chapter. In particular I consider the provisions:
- (a) Are consistent with Part 2 of the RMA, as the disposal of earthquake waste will assist in the rehabilitation and rebuilding of greater Christchurch, contributing to the social, economic and health and safety benefits associated with a timely and efficient rebuild and recovery. Furthermore, the BRRP allows for the sorting and recycling of earthquake waste, promoting sustainable management by reducing the total volume of waste being sent to landfill for disposal.
  - (b) Implement Strategic Directions Objective 3.3.1 - Enabling recovery and facilitating the future enhancement of the district. The continuation of the operations undertaken at BRRP and the Burwood Landfill is considered necessary for recovery as it:
    - (i) allows earthquake waste to be removed from properties in an efficient and cost effective manner;
    - (ii) allows materials to be recycled where possible; and
    - (iii) enables property with damaged structures to be cleared, providing space for future rebuilding.
  - (c) Implement Strategic Directions Objective 3.3.2 - Clarity of language and efficiency. The Agreed Provisions contain a clear planning framework which enables the BRRP and landfill to continue to operate as necessary while providing direction where resource consent may be required, and streamlining any consenting process where necessary through the use of a controlled, non-notified consent activity status.
  - (d) Implement Strategic Directions Objective 3.3.7 - Urban growth, form and design. By providing flexibility for the BRRP and the Burwood Landfill to continue to operate as necessary for recovery, the processing and disposal of earthquake waste within a close proximity to the source of the material can continue to occur at an existing facility. Continuing the operations at BRRP and the Burwood Landfill utilise existing facilities, optimising the potential capacity within the proposed zone.

- (e) Implement Strategic Directions Objective 3.3.9 - Natural and cultural environment. Although the continued operation of the BRRP and the Burwood Landfill will delay full public access to the area, the Agreed Proposal provides for the progressive rehabilitation of the site and public access to these rehabilitated areas to occur prior to cessation of disposal activities.
- (f) Have particular regard to the Statement of Expectations, particularly clauses (a), (b), (c) and (f) for the reasons summarised in (c) above.
- (g) Give effect to the Canterbury Regional Policy Statement ("**RPS**"), in particular Chapters 6 and 19. The Agreed Proposal gives effect to Objectives 6.2.3 and 19.2.2, and Policies 6.3.2, 19.3.1 and 19.3.4 by providing a sustainable alternative (through material recovery in the BRRP) to sending all earthquake waste straight to the landfill and reducing the total volume being sent to landfill.
- (h) Are consistent with:
  - (i) The Recovery Strategy, particularly goals 1.1, 1.5 and 6.6. The Agreed Proposal is consistent with: goal 1.1 as it provides certainly around the security of a suitable disposal location being provided within a close proximity of the City and provides a streamlined and targeted consenting pathway where it is considered that there may be environmental effects from the recovery park or landfill activities; goal 1.5 as it provides for a specific planning framework and consenting pathway with targeted input from only those individuals or groups which could be impacted by the activities within the proposed zones and also continues to use a council facility so that capacity of other district or regional facilities are not reduced; and goal 6.6 as the BRRP minimises the volume of waste going to landfill by separating out recyclable materials for reuse.
  - (ii) The LURP, particularly outcomes 3, 4, 5 and 9. The Agreed Proposal provides for processing and disposal facilities within a close proximity of the city which enables earthquake waste to be removed from sites in an efficient and cost effective manner. The targeted planning framework increases certainty for the operator and adjacent communities, by providing for a streamlined consenting process where resource consent is required.

## 8. CONCLUSION

- 8.1 I consider that the continued operation of the BRRP and Burwood Landfill is necessary for earthquake recovery because the facilities provide for efficient and cost-effective earthquake waste processing and disposal. The facilities provide a sustainable management option to address the significant volume of earthquake waste resulting from the demolition of damaged buildings following the Canterbury earthquakes.
- 8.2 In my opinion the Agreed Proposal appropriately provides for the continuation of earthquake waste processing and disposal, and (as discussed in section 7 above) meets the statutory criteria.

A handwritten signature in blue ink, appearing to be 'Nardia Alice Nanette Yozin', written in a cursive style.

**Nardia Alice Nanette Yozin**

24 November 2015

## ATTACHMENT A - LIST OF DOCUMENTS AND EVIDENCE RELIED ON

- (a) The notified version of the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone Proposal ("**Proposal 21.12**")
- (b) The Agreed Proposal ("**Agreed Proposal**"), updated following mediation
- (c) The Section 32 evaluation report for the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone Proposal
- (d) The Recovery Strategy for Greater Christchurch: Mahere Haumanutanga o Waitaha ("**Recovery Strategy**")
- (e) Canterbury Natural Resources Regional Plan ("**NRRP**")
- (f) Canterbury Land and Water Regional Plan ("**LWRP**")
- (g) Canterbury Earthquake Recovery Act 2011 ("**CER Act**")
- (h) Statement of Expectations in Schedule 4 of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 ("**SOE**")
- (i) Canterbury Earthquake (Resource Management Act - Burwood Resource Recovery Park) Order 2011 ("**BRRP Order**")
- (j) Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 ("**the Order**")
- (k) Mahaanui Iwi Management Plan 2013
- (l) The decision of the hearings panel on Strategic Directions and Strategic Outcomes (and Relevant Definitions) dated 26 February 2015
- (m) The Land Use Recovery Plan: Te Mahere Whakahaumanu Taone ("**LURP**")
- (n) The statement of evidence of Kimberley Rolton for the Council dated 12 November 2015
- (o) The statements of evidence, in relation to Proposal 21.12, of:
  - a. Mathew Clark for the Crown dated 24 November 2015;
  - b. Daniel Murray for BRRP (in draft); and
  - c. Gareth James for BRRP (in draft)
- (p) The Operative Christchurch City Plan ("**City Plan**").

## ATTACHMENT B - CROWN SUBMISSION POINTS - SPECIFIC PURPOSE (BURWOOD LANDFILL AND RESOURCE RECOVERY PARK) ZONE PROPOSAL

	Crown Submission - Replacement Plan Provisions	CCC Recommendation (CCC Evidence and Redline version)	Crown position following mediation	Evidence paragraph reference
1	<p>Crown Submission Point 3721.99, 3721.100, 3721.101, 3721.102:</p> <p><b>Amend</b> the definition of "earthquake waste" as follows:</p> <p>means:</p> <ul style="list-style-type: none"> <li>a. solid waste resulting from the Canterbury earthquakes, including liquefaction silt; <u>and</u></li> <li>b. solid waste resulting from any construction work (within the meaning of section 6 of the Construction Contracts Act 2002) undertaken as a result of the Canterbury earthquakes;</li> <li>c. hard fill from the district's sewer, water and road network; and</li> <li>d. liquid waste extracted from the district's infrastructure network;</li> </ul> <p>but does not include any of the following <u>unless it is not reasonably practicable to separate it from the waste specified in (a)-(d) above</u>:</p> <ul style="list-style-type: none"> <li>e. general domestic refuse;</li> <li>f. human waste;</li> <li>g. building insulation and building materials containing asbestos;</li> <li>h. hazardous substances and waste; or</li> <li>i. waste material from an industrial process or trade process.</li> </ul>	<p>Accept</p> <p>Earthquake Waste</p> <p>as follows:</p> <p>means:</p> <ul style="list-style-type: none"> <li>a. solid waste resulting from the Canterbury earthquakes, including liquefaction silt; <u>and</u></li> <li>b. solid waste resulting from any construction work (within the meaning of section 6 of the Construction Contracts Act 2002) undertaken as a result of the Canterbury earthquakes;</li> <li>c. hard fill from the district's sewer, water and road network; and</li> <li>d. liquid waste extracted from the district's infrastructure network;</li> </ul> <p>but does not include any of the following <u>unless it is not reasonably practicable to separate it from the waste specified in (a)-(d) above</u>:</p> <ul style="list-style-type: none"> <li>e. general domestic refuse;</li> <li>f. human waste;</li> <li>g. building insulation and building materials containing asbestos;</li> <li>h. hazardous substances and waste; or</li> </ul> <p>waste material from an industrial process or trade process.</p>	<p>The Crown Supports this amendment of 'earthquake waste' to be the same as the definition contained in the BRRP Order.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, para 12.1</p>

2	Crown Submission Point 3721.1391: recognise that the Burwood Resource Recovery Park and Burwood Landfill is crucial to the on-going recovery of Christchurch.	Accept (see row 6)	The Crown supports the amendment to Objective 21.12.1.1	Ms Nardia Yozin, paras 1.6(a), 4.2 & 4.3  Ms Kimberley Rolton, paras 3.3, 3.5, 4.12-4.16 & 7.1
3	Crown Submission Point 3721.1392: provide a planning framework which allows the Burwood Resource Recovery Park and Burwood Landfill to function as required to assist with recovery.	Accept	The Crown considers that the Agreed Proposal provides a sufficient planning framework to allow the Burwood Landfill and Resource Recovery Park to function as required to assist with recovery.	Ms Nardia Yozin, paras 1.6(a), 4.2, 4.3, 6.4, 6.5, 7.1 - 7.5 & 8.1 - 8.2  Ms Kimberley Rolton, paras 3.3, 3.5, 4.12-4.16, 7.1 & 7.2
4	Crown Submission Point 3721.1393: provide provisions which provide certainty for the operator and the Council as the owner of the Burwood Resource Recovery Park and Burwood Landfill to operate the facilities efficiently.	Accept	The Crown considers that the Agreed Proposal provides certainty to the operator and Council, enabling the facilities to operate efficiently.	Ms Nardia Yozin, paras 1.6(a), 4.2, 4.3, 6.4, 6.5, 7.1 - 7.5 & 8.1 - 8.2  Ms Kimberley Rolton, paras 3.3, 3.5, 4.12-4.16 & 7.1
5	Crown Submission Point 3721.1394: mitigate the adverse effects of Burwood Resource Recovery Park and Burwood Landfill activities on people and the environment.	Accept	The Crown considers that the Agreed Proposal address any potential environmental effects and mitigates as necessary.	Ms Nardia Yozin, paras 1.6(a), 4.2, 4.3, 6.4, 6.5, 7.1 - 7.5 & 8.1 - 8.2  Ms Kimberley Rolton, paras 6.2, 6.6, 6.8 and 9.14

6	<p>Crown Submission Point 3721.1401:</p> <p><b>Add</b> a new objective 21.12.1.x as follows:</p> <p><b><u>21.12.1.x Objective - Facilitating recovery and disposal of earthquake waste</u></b></p> <p>a. <u>Efficient and safe operation and management of the Burwood Landfill and Burwood Resource Recovery Park.</u></p>	<p>Accept in Part</p> <p><b><u>21.12.1.1. OBJECTIVE: FACILITATE PROCESSING AND DISPOSAL OF EARTHQUAKE WASTE EFFICIENT OPERATIONS</u></b></p> <p>a. <u>The Facilitate earthquake waste processing and disposal activities at Burwood Resource Recovery Park and Burwood Landfill are operated efficiently, recognising their significance in supporting earthquake recovery to support earthquake recovery in a way which minimises adverse effects on the environment.</u></p>	<p>The Crown supports the amendment to Objective 21.12.1.1.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 4.2, 4.3, 6.4, 6.5, 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, para 8.1</p>						
7	<p>Crown Submission Point 3721.1402:</p> <p><b>Amend</b> Policy 21.12.1.1.1 as follows:</p> <p>a. Provide for the existing and ongoing need for earthquake waste recovery and disposal activities as follows:</p> <p>i. ...</p> <p>ii. ...</p> <p>x. <u>Provide flexibility for future activities on the site as needed to assist with recovery.</u></p>	<p>Accept in Part</p> <p><b><u>21.12.1.1.1.Policy: Facilitating recovery and disposal of earthquake waste</u></b></p> <p>a. Provide for the existing and ongoing need for earthquake waste <del>recovery</del> <u>processing</u> and disposal activities as follows:</p> <p>i. ...</p> <p>ii. <u>Allow flexibility for permanent earthquake waste disposal sites within the Zone. Continue the operation of the Burwood Landfill as the primary permanent disposal site of residual earthquake waste.</u></p>	<p>The Crown Supports the amendment to Policy 21.12.1.1.1.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 4.2, 4.3, 6.4, 6.5, 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 8.4 &amp; 8.5</p>						
8	<p>Crown Submission Points 3721.1403, 3721.1404, 3721.1405, 3721.1406, 3721.1407, 3721.1408, 3721.1409, 3721.1410, 3721.1411, 3721.1412, 3721.1413, 3721.1414, 3721.1415, 3721.1416, 3721.1417 and 3721.1418:</p> <p><b>Amend</b> the Activity Specific Standards for 21.12.2.2.1 (P1) as follows:</p> <table border="1" data-bbox="215 1179 698 1426"> <tr> <td data-bbox="215 1179 248 1426">P1</td> <td data-bbox="257 1179 376 1426">Disposal of earthquake waste.</td> <td data-bbox="385 1179 698 1426"> <p>a. ....</p> <p>b. Material disposed <u>at the Burwood Landfill</u> shall only be residual earthquake waste from the operations at the "Burwood Resource Recovery Park".</p> </td> </tr> </table>	P1	Disposal of earthquake waste.	<p>a. ....</p> <p>b. Material disposed <u>at the Burwood Landfill</u> shall only be residual earthquake waste from the operations at the "Burwood Resource Recovery Park".</p>	<p>3721.1403, 3721.1404, 3421.1405, 3721.1407, 3721.1408, 3721.1409, 3721.1410, 3721.1411, 3721.1413, 3721.1414 and 3721.1418 - Reject</p> <p>3721.1406, 3721.1412, 3721.1415, 3721.1416, 3721.1417 - Accept</p> <table border="1" data-bbox="730 1054 1464 1426"> <tr> <td data-bbox="730 1054 786 1426">P1</td> <td data-bbox="795 1054 947 1426">Disposal of earthquake waste.</td> <td data-bbox="956 1054 1464 1426"> <p>a. <del>Disposal of earthquake waste shall only occur within the area marked as "Burwood Landfill" in Appendix 21.12.3.1.</del></p> <p>a. <del>b.</del>Material disposed shall only be:</p> <p>i. residual earthquake waste from the operations at the "Burwood Resource Recovery Park";</p> <p>ii. <u>liquefaction silt;</u></p> <p>iii. <u>hardfill from the City's sewer, water and road network;</u></p> <p>iv. <u>liquid waste extracted from the City's infrastructure network.</u></p> </td> </tr> </table>	P1	Disposal of earthquake waste.	<p>a. <del>Disposal of earthquake waste shall only occur within the area marked as "Burwood Landfill" in Appendix 21.12.3.1.</del></p> <p>a. <del>b.</del>Material disposed shall only be:</p> <p>i. residual earthquake waste from the operations at the "Burwood Resource Recovery Park";</p> <p>ii. <u>liquefaction silt;</u></p> <p>iii. <u>hardfill from the City's sewer, water and road network;</u></p> <p>iv. <u>liquid waste extracted from the City's infrastructure network.</u></p>	<p>The Crown supports the redrafting of 21.12.2.2.1(P1) and considers that the amendments contained in the Agreed Proposal address the Crowns concerns raised through submission.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 9.24 - 9.35 &amp; 9.37</p>
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P1	Disposal of earthquake waste.	<p>a. <del>Disposal of earthquake waste shall only occur within the area marked as "Burwood Landfill" in Appendix 21.12.3.1.</del></p> <p>a. <del>b.</del>Material disposed shall only be:</p> <p>i. residual earthquake waste from the operations at the "Burwood Resource Recovery Park";</p> <p>ii. <u>liquefaction silt;</u></p> <p>iii. <u>hardfill from the City's sewer, water and road network;</u></p> <p>iv. <u>liquid waste extracted from the City's infrastructure network.</u></p>								

		<p>c. Earthquake waste permanently placed in the <u>Burwood</u> landfill shall be:</p> <p>d. ....</p> <p>e. Dunes and downlands within the zone shall at no point be more than 25 metres above the level of the ground as measured at the intersection of Rothesay Road and Bower Avenue, and shall merge with the natural ground level of the terrain at the outer edge of the landfill.</p> <p>f. Earthquake waste shall be placed above the highest anticipated ground water level, unless excavated or low areas below this level are backfilled to above this level with inert fill.</p> <p><del>g. Movement of vehicles within the "Burwood Landfill" shall take place between 0500 and 2100 hours Monday through to Saturday, unless exceptional circumstances apply.</del></p> <p>h. ...</p> <p><del>i. Any erection of buildings:</del></p> <p><del>i. Shall be ancillary to landfill operations; and</del></p> <p><del>ii. Shall not exceed a total of 200m<sup>2</sup> gross floor area.</del></p> <p><del>j. As long as "Burwood Landfill" is in operation, at</del></p>		<p>b. <del>e.</del>Earthquake waste permanently placed in the landfill shall be:</p> <p>i. compacted using specialised compaction equipment; and</p> <p>ii. covered by sand or soil to a minimum depth of 150mm <del>on a daily basis upon completion of filling in any given area (except materials collected for composting).</del></p> <p><del>d. The working surface of each daily waste cell shall not exceed an area of 500m<sup>2</sup>.</del></p> <p>c. <del>e.</del>Earthquake waste shall <del>Dunes and downlands within the zone shall</del> at no point be more than 25 metres above the level of the ground as measured at the intersection of Rothesay Road and Bower Avenue, and shall merge with the natural ground level of the terrain at the outer edge of the landfill.</p> <p><del>f. Earthquake waste shall be placed above the highest anticipated ground water level, unless excavated or low areas below this level are backfilled to above this level with inert fill.</del></p> <p>d. <del>g.</del>As long as the "Burwood Landfill" is in operation, at least three parallel rows of trees, capable of meeting 8m in height, shall be maintained.</p> <p><i>General</i></p> <p>e. <del>h.</del>Movement of vehicles within the "Burwood Landfill" shall take place between 0500 and 2100 hours Monday through to Saturday, unless exceptional circumstances apply.</p> <p>f. <u>Delivery of earthquake waste shall occur only between 0530 and 1830 hours Monday through to Saturday.</u></p> <p>g. <del>h.</del>The site shall not operate on Sundays and public holidays.</p> <p><del>j.</del> Any erection of buildings:</p> <p><del>i. shall be ancillary to landfill operations; and</del></p> <p><del>ii. shall not exceed a total of 200m<sup>2</sup> gross floor area.</del></p>		
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		<p>least three parallel rows of trees, capable of meeting 8m in height, shall be maintained.</p> <p>k. Mesh fences and screens shall be maintained around working areas to contain windblown waste, and any material blown beyond this containment area shall be collected on a weekly basis, or more frequently if required.</p> <p>l. <del>Dust arising from activities, roads or unconsolidated sand, soil or earth is to be suppressed in windy conditions.</del></p> <p>m. Birds and vermin shall be controlled to avoid nuisance within and adjacent the site.</p> <p>n. Access shall be provided for fire appliances through boundary planting areas and a water supply shall be available to assist with fire fighting both within the landfill area and in the adjoining Bottle Lake Forest Open Space Natural Zone</p> <p>e. <del>No burning of earthquake waste or incineration processes, shall be undertaken within the zone.</del></p> <p>p. Public access to the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone shall be confined to</p>		<p>h. <del>k.</del> Mesh fences and screens shall be maintained around working areas to contain windblown waste, and any material blown beyond this containment area shall be collected on a weekly basis, or more frequently if required.</p> <p>i. <del>l.</del> Dust arising from activities, roads or unconsolidated sand, soil or earth is to be suppressed in windy conditions.</p> <p>j. <del>m.</del> Birds and vermin shall be controlled to avoid nuisance within and adjacent the site.</p> <p>k. <del>n.</del> Access shall be provided for fire appliances through boundary planting areas and a water supply shall be available to assist with fire fighting both within the landfill area <u>Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone</u> and in the adjoining Bottle Lake Forest Open Space Natural Zone.</p> <p>e. <del>No burning of earthquake waste or incineration processes, shall be undertaken within the zone.</del></p> <p>l. <del>p.</del> Public access to the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone shall be confined to: <ul style="list-style-type: none"> <li>i. vehicles owned by or under contract to the Christchurch City Council, except: <ol style="list-style-type: none"> <li>1. vehicles of any other local authority approved by the Council;</li> <li>2. vehicles carrying compacted waste;</li> <li>3. vehicles carrying hardfill or other materials unsuited to compaction; and</li> <li>4. vehicles carrying cover material.</li> </ol> </li> <li>ii. <u>Recreational use as provided for by Rule 21.12.2.2.1 P5</u></li> </ul> </p> <p>m. <del>q.</del> All earthquake waste shall be transported in a container or covered, except where because of the nature of</p>		
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		<p>vehicles owned by or under contract to the Christchurch City Council, except:</p> <ul style="list-style-type: none"> <li>i. Vehicles of any other local authority approved by the Council.</li> <li>ii. vehicles carrying compacted waste;</li> <li>iii. vehicles carrying hardfill or other materials unsuited to compaction; and</li> <li>iv. vehicles carrying covered material.</li> </ul> <p>q. All earthquake waste shall be transported in a container or covered, except where because of the nature of the load and/or method of securing it, no problem of litter or dust can arise.</p> <p>r. Final contours of each completed stage of the landfill shall be in general accordance with the landscape concept plan outlined in Appendix 21.13.3.2.</p> <p>s. The preparation of areas of rehabilitated landfill that are to be planted in accordance with the landscape concept plan in Appendix 21.12.3.2, to ensure that healthy planting and growth of trees and shrubs and grass cover on the landfill</p>		<p>the load and/or method of securing it, no problem of litter or dust can arise.</p> <p><u>Transport</u></p> <ul style="list-style-type: none"> <li>n. <u>For the duration of the operation of the Burwood Resource Recovery Park and Burwood Landfill:</u> <ul style="list-style-type: none"> <li>i. <u>the only access shall be as shown in Appendix 21.12.3.1; and</u></li> <li>ii. <u>The noise bund and acoustic fence shall be maintained, as shown in Appendix 21.12.3.2.</u></li> </ul> </li> <li>o. <u>Vehicle movements shall not exceed more than 50 vehicle trips per peak hour or 250 heavy vehicle trips per day (whichever is met first). 'Peak hour' are those hours between 3 pm and 7 pm on a weekday.</u></li> <li><del>p. Vehicles carrying earthquake waste from various sources within the City and from neighbouring Territorial Authorities to the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone shall adhere to the routes shown in Appendix 21.12.3.2, where practicable.</del></li> </ul> <p><u>Rehabilitation</u></p> <ul style="list-style-type: none"> <li>r. Final contours of each completed stage of the landfill shall be in general accordance with the landscape concept plan outlined in Appendix 21.12.3.2.</li> <li>s. Areas of rehabilitation are to be planted in accordance with the landscape concept plan in Appendix 21.12.3.2, to ensure that healthy planting and growth of trees and shrubs and grass cover within the Zone can occur.</li> <li>t. All planting shall be maintained in accordance with the landscape concept plan in Appendix 21.12.3.2.</li> <li>p. A rehabilitation / closure plan for the <u>Specific Purpose (Burwood Landfill and Resource Recovery Park) zone must be submitted for Council approval by September 2016.</u></li> <li>q. u. Each completed Burwood Landfill</li> </ul>		
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		<p>can occur.</p> <p>t. <del>All planting shall be maintained in accordance with the landscape concept plan in Appendix 21.12.3.2.</del></p> <p>u. <del>Each completed landfill stage shall, as soon as practicable after completion of waste placement in the state, be capped and landscaped in accordance with the landscape concept plan in Appendix 21.12.3.2.</del></p>		<p>stage <u>Disposal areas</u> shall, as soon as practicable after completion of waste placement in that <u>area</u> stage, be <u>progressively rehabilitated</u> (capped and landscaped) in accordance with <u>the rehabilitation / closure plan referred to under (q) above, the landscape concept plan in Appendix 21.12.3.2.</u></p> <p>r. <u>Disposal of earthquake waste shall not take place within a Flood Management Area.</u></p>		
9	<p>Crown Submission Points 3721.1419 and 3721.1420:</p> <p>The Crown seeks that the Section 32 analysis provides justification for 21.12.2.1 (P1)(e) and (f).</p>	<p>Accept in Part</p> <p>(see row 8)</p>		<p>The Crown supports the amendment of 21.12.2.1(P1)(e) and the removal of 21.12.2.1 (P1)(f).</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 9.24 - 9.35</p>	

10	<p>Crown Submission Point 3721.1421, 3721.1422, 3721.1423, 3721.1424 and 3721.1425:</p> <p><b>Amend 21.12.2.1 (P2) as follows:</b></p> <table border="1" data-bbox="215 304 701 1437"> <tr> <td data-bbox="215 304 376 1437">P2 Earthquake waste processing activities.</td> <td data-bbox="376 304 701 1437"> <p>a. Earthquake waste processing <del>are</del> <u>is</u> only undertaken within the areas marked "BRRP <del>or Site D</del> on Appendix 21.12.3.2.</p> <p>b. <del>No Earthquake waste which is not reasonably practicable to separate from</del> hazardous substances <del>shall</del> <u>will not</u> be accepted at the site <del>unless it can</del> <u>which cannot</u> be disposed of safely.</p> <p>c. ...</p> <p>d. ...</p> <p>e. Following completion of activities the site is <u>to be</u> cleared of all machinery and plant used for earthquake waste processing activities and reinstated <u>in accordance with the landscape concept plan in Appendix 21.12.3.2.</u></p> <p>f. <del>Any erection of buildings:</del></p> <p>i. <del>Shall be ancillary to recovery park operations; and</del></p> <p>ii. <del>shall not exceed a total of 200m<sup>2</sup> gross floor area.</del></p> <p>g. The activity specific standards <del>(k) to (q)</del> <u>outlined under P1 also apply to this activity.</u></p> </td> </tr> </table>	P2 Earthquake waste processing activities.	<p>a. Earthquake waste processing <del>are</del> <u>is</u> only undertaken within the areas marked "BRRP <del>or Site D</del> on Appendix 21.12.3.2.</p> <p>b. <del>No Earthquake waste which is not reasonably practicable to separate from</del> hazardous substances <del>shall</del> <u>will not</u> be accepted at the site <del>unless it can</del> <u>which cannot</u> be disposed of safely.</p> <p>c. ...</p> <p>d. ...</p> <p>e. Following completion of activities the site is <u>to be</u> cleared of all machinery and plant used for earthquake waste processing activities and reinstated <u>in accordance with the landscape concept plan in Appendix 21.12.3.2.</u></p> <p>f. <del>Any erection of buildings:</del></p> <p>i. <del>Shall be ancillary to recovery park operations; and</del></p> <p>ii. <del>shall not exceed a total of 200m<sup>2</sup> gross floor area.</del></p> <p>g. The activity specific standards <del>(k) to (q)</del> <u>outlined under P1 also apply to this activity.</u></p>
P2 Earthquake waste processing activities.	<p>a. Earthquake waste processing <del>are</del> <u>is</u> only undertaken within the areas marked "BRRP <del>or Site D</del> on Appendix 21.12.3.2.</p> <p>b. <del>No Earthquake waste which is not reasonably practicable to separate from</del> hazardous substances <del>shall</del> <u>will not</u> be accepted at the site <del>unless it can</del> <u>which cannot</u> be disposed of safely.</p> <p>c. ...</p> <p>d. ...</p> <p>e. Following completion of activities the site is <u>to be</u> cleared of all machinery and plant used for earthquake waste processing activities and reinstated <u>in accordance with the landscape concept plan in Appendix 21.12.3.2.</u></p> <p>f. <del>Any erection of buildings:</del></p> <p>i. <del>Shall be ancillary to recovery park operations; and</del></p> <p>ii. <del>shall not exceed a total of 200m<sup>2</sup> gross floor area.</del></p> <p>g. The activity specific standards <del>(k) to (q)</del> <u>outlined under P1 also apply to this activity.</u></p>		

 3721.1421, 3721.1422, 3721.1423 and 3721.1425 - Reject 3721.1424 - Accept   |  |  | |--|--| | P2 Earthquake waste processing activities. | <p><del>a. Earthquake waste processing activities are only undertaken within the area marked "BRRP" on Appendix 21.12.3.1.</del></p> <p><del>b. No hazardous substances shall be accepted at the site which cannot be disposed of safely.</del></p> <p><del>c. Delivery of earthquake waste demolition materials for earthquake waste processing activities shall occur only between 0530 and 1830 hours Monday through to Saturday.</del></p> <p><del>d. The site shall not operate on Sundays and public holidays.</del></p> <p><del>e. Any erection of buildings:</del></p> <p>i. <del>shall be ancillary to recovery park operations; and</del></p> <p>ii. <del>shall not exceed a total of 200m<sup>2</sup> gross floor area.</del></p> <p>a. <del>g.</del> The activity specific standards <del>(ke)</del> <u>(qp)</u> outlined under P1 also apply to this activity.</p> <p>b. <del>e.</del> Following completion of activities the site is cleared of all machinery and plant used for earthquake waste processing activities and reinstated.</p> <p>c. <del>Upon completion of earthquake waste processing activities, these areas shall be rehabilitated in accordance with the rehabilitation / closure plan referred to in activity specific standard (p) for P1 activities.</del></p> | |--|--| | The Crown supports the redrafting of 21.12.2.1(P2) and considers that the amendments contained in the Agreed Proposal address the Crown's concerns raised through submission. | Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 & 8.1 - 8.2  Ms Kimberley Rolton, paras 9.24 - 9.35 & 9.37 |

11	<p>Crown Submission Point 3721.1426:  <b>Add</b> a new permitted activity (Pxi) as follows:</p>	<p>Reject</p>	<p>The Crown supports the redrafting of 21.12.2.2.1(P1) and (P2) and consider that the amendments contained in the Agreed Proposal address the Crowns concerns raised through submission.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2  Ms Kimberley Rolton, para 9.32</p>
Pxi	<p><u>Ancillary operational activities within the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.</u></p>	<p>a. <u>Movement of vehicles within the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone shall take place between 0500 and 2100 hours Monday through to Saturday, unless exceptional circumstances apply.</u></p> <p>b. <u>Mesh fences and screens shall be maintained around working areas to contain windblown waste, and any material blown beyond this containment area shall be collected on a weekly basis, or more frequently if required.</u></p> <p>c. <u>Dust arising from activities, roads or unconsolidated sand, soil or earth is to be suppressed in windy conditions.</u></p> <p>d. <u>For the duration of the operation of the Resource Recovery Park and Burwood Landfill, at least three parallel rows of trees (capable of meeting a height of 8m), shall be maintained.</u></p> <p>e. <u>Birds and vermin shall be controlled to avoid nuisance within and adjacent to the site.</u></p> <p>f. <u>Access shall be provided for fire appliances through boundary</u></p>		

		<p><u>planting areas and a water supply shall be available to assist with fire fighting both within the landfill area and in the adjoining Bottle Lake Forest Open Space Natural Zone.</u></p> <p>g. <u>No burning of earthquake waste or incineration processes shall be undertaken within the zone.</u></p> <p>h. <u>Public access to the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone shall be confined to vehicles owned or under contract to the Christchurch City Council, except:</u></p> <ul style="list-style-type: none"> <li>i. <u>Vehicles of any other local authority approved by the Council;</u></li> <li>ii. <u>Vehicles carrying compacted earthquake waste;</u></li> <li>iii. <u>Vehicles carrying hardfill or other materials unsuited to compaction; and</u></li> <li>iv. <u>Vehicles carrying cover material.</u></li> </ul> <p>i. <u>All earthquake waste shall be transported in a container or covered, except where because of the nature of the load and/ or method of securing it, no problem of litter or dust during transportation can arise.</u></p>			
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12	<p>Crown Submission Point 3721.1427:</p> <p><b>Add</b> a new Permitted Activity (Pxii) as follows:</p> <table border="1" data-bbox="215 288 698 772"> <tr> <td data-bbox="215 288 264 772">Pxii</td> <td data-bbox="264 288 389 772"> <u>Erection of buildings within the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.</u> </td> <td data-bbox="389 288 698 772"> <p>a. <u>Any erection of buildings:</u></p> <p>i. <u>shall be ancillary to Resource Recovery Park or Burwood Landfill operations; and</u></p> <p>ii. <u>shall not exceed a total of 200m<sup>2</sup> gross floor area; and</u></p> <p>iii. <u>shall be removable/ relocatable at completion of operations.</u></p> </td> </tr> </table>	Pxii	<u>Erection of buildings within the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.</u>	<p>a. <u>Any erection of buildings:</u></p> <p>i. <u>shall be ancillary to Resource Recovery Park or Burwood Landfill operations; and</u></p> <p>ii. <u>shall not exceed a total of 200m<sup>2</sup> gross floor area; and</u></p> <p>iii. <u>shall be removable/ relocatable at completion of operations.</u></p>	<p>Accept</p> <table border="1" data-bbox="730 209 1460 453"> <tr> <td data-bbox="730 209 779 453">P3</td> <td data-bbox="779 209 949 453"> <u>Erection of buildings</u> </td> <td data-bbox="949 209 1460 453"> <p>a. <u>Any erection of buildings:</u></p> <p>i. <u>shall be ancillary to Burwood Resource Recovery Park or Burwood Landfill operations; and</u></p> <p>ii. <u>shall not exceed a total of 200 m<sup>2</sup> gross floor area; and</u></p> <p>iii. <u>shall be removable/ relocatable at completion of operations.</u></p> </td> </tr> </table>	P3	<u>Erection of buildings</u>	<p>a. <u>Any erection of buildings:</u></p> <p>i. <u>shall be ancillary to Burwood Resource Recovery Park or Burwood Landfill operations; and</u></p> <p>ii. <u>shall not exceed a total of 200 m<sup>2</sup> gross floor area; and</u></p> <p>iii. <u>shall be removable/ relocatable at completion of operations.</u></p>	<p>The Crown supports the addition of 21.12.2.2.1(P3).</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 9.33 &amp; 9.38</p>
Pxii	<u>Erection of buildings within the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.</u>	<p>a. <u>Any erection of buildings:</u></p> <p>i. <u>shall be ancillary to Resource Recovery Park or Burwood Landfill operations; and</u></p> <p>ii. <u>shall not exceed a total of 200m<sup>2</sup> gross floor area; and</u></p> <p>iii. <u>shall be removable/ relocatable at completion of operations.</u></p>								
P3	<u>Erection of buildings</u>	<p>a. <u>Any erection of buildings:</u></p> <p>i. <u>shall be ancillary to Burwood Resource Recovery Park or Burwood Landfill operations; and</u></p> <p>ii. <u>shall not exceed a total of 200 m<sup>2</sup> gross floor area; and</u></p> <p>iii. <u>shall be removable/ relocatable at completion of operations.</u></p>								
13	<p>Crown Submission Point 3721.1428:</p> <p><b>Add</b> a new Permitted Activity (Pxiii) as follows:</p> <table border="1" data-bbox="215 887 698 1436"> <tr> <td data-bbox="215 887 264 1436">Pxiii</td> <td data-bbox="264 887 412 1436"> <u>Rehabilitation of the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.</u> </td> <td data-bbox="412 887 698 1436"> <p>a. <u>Each completed Burwood Landfill stage shall, as soon as practicable after completion of waste placement in that stage, be capped and landscaped in accordance with the landscape concept plan in Appendix 21.12.3.2.</u></p> <p>b. <u>Final contours of each completed stage of the landfill shall be in general accordance with the landscape concept plan outlined in Appendix 21.13.3.2</u></p> </td> </tr> </table>	Pxiii	<u>Rehabilitation of the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.</u>	<p>a. <u>Each completed Burwood Landfill stage shall, as soon as practicable after completion of waste placement in that stage, be capped and landscaped in accordance with the landscape concept plan in Appendix 21.12.3.2.</u></p> <p>b. <u>Final contours of each completed stage of the landfill shall be in general accordance with the landscape concept plan outlined in Appendix 21.13.3.2</u></p>	<p>Reject</p>	<p>The Crown supports the redrafting of 21.12.2.2.1(P1) and considers that the amendments contained in the Agreed Proposal address the Crowns concerns raised through submission.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 9.37 &amp; 9.38</p>			
Pxiii	<u>Rehabilitation of the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone.</u>	<p>a. <u>Each completed Burwood Landfill stage shall, as soon as practicable after completion of waste placement in that stage, be capped and landscaped in accordance with the landscape concept plan in Appendix 21.12.3.2.</u></p> <p>b. <u>Final contours of each completed stage of the landfill shall be in general accordance with the landscape concept plan outlined in Appendix 21.13.3.2</u></p>								

		<p>c. <u>Areas of rehabilitated Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone are to be planted in accordance with the landscape concept plan in Appendix 21.12.3.2, to ensure that healthy planting and growth of trees and shrubs and grass cover within the Zone can occur.</u></p> <p>d. <u>All planting shall be maintained in accordance with the landscape concept plan in Appendix 21.12.3.2.</u></p>			
14	<p>Crown Submission Point 3721.1429:  <b>Amend</b> 21.12.3.1 - Site Layout - Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone to:</p> <ol style="list-style-type: none"> <li>Label Site D.</li> </ol>	Reject		<p>The Crown supports the amendments to 21.12.3.1 - Site Layout and considers that the amendments contained in the Agreed Proposal address the Crowns concerns raised through submission.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2  Ms Kimberley Rolton, paras 10.1 &amp; 10.2</p>
15	<p>Crown Submission Point 3721.1430:  <b>Amend</b> 21.12.3.1 - Site Layout - Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone to:</p> <ol style="list-style-type: none"> <li>Identify "dunes and Downlands" stated in 21.12.2.2.1 (P1)(e).</li> </ol>	Reject		<p>The Crown considers that the deletion of 21.12.2.2.1(P1)(e) addresses the Crowns concerns.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p>
16	<p>Crown Submission Point 3721.1431:  <b>Amend</b> 21.12.3.1 - Site Layout - Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone to:</p> <ol style="list-style-type: none"> <li>Identify location of trees which are managed by 21.12.2.2.1 (P1)(j).</li> </ol>	Reject		<p>The Crown considers that the permitted activity standards in 21.12.2.2.1(P1) and (P2) will address the Crowns concerns raised in the submission.</p>	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2  Ms Kimberley Rolton, paras 10.1 &amp; 10.2</p>

17	<p>Crown Submission Point 3721.1432:  <b>Amend</b> 21.12.3.1 - Site Layout - Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone to:</p> <p>4. Identify access routes stated in 21.12.2.2.2 (C1)(a).</p>	Accept in Part	The Crown considers that the amendments to the General Rules (Noise) Proposal and the bunding and other mitigation around the entrance of the Recovery Park and Landfill will address the concerns raised through the submission.	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 9.14, 10.1 &amp; 10.2</p>
18	<p>Crown Submission Point 3721.1433:  <b>Amend</b> 21.12.3.1 - Site Layout - Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone to:</p> <p>5. Present in an A4 Landscape format (to improve readability).</p>	Accept	The Crown Supports this amendment.	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 10.1 &amp; 10.2</p>
19	<p>Crown Submission Point 3721.1434:  <b>Amend</b> 21.12.3.2 - Landscape Concept Plan - Burwood Landfill to:</p> <p>1. Include the area marked BRRP on 21.12.3.1.</p>	Reject	The Crown considers that the deletion of 21.12.3.1 - Landscape Concept Plan addresses the Crowns concerns.	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 10.1 &amp; 10.2</p>
20	<p>Crown Submission Point 3721.1435:  <b>Amend</b> 21.12.3.2 - Landscape Concept Plan - Burwood Landfill to:</p> <p>2. Include final contours stated in 21.12.2.2.1 (P1)(r).</p>	Reject	The Crown considers that the deletion of 21.12.3.1 - Landscape Concept Plan addresses the Crowns concerns.	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 10.1 &amp; 10.2</p>
21	<p>Crown Submission Point 3721.1436, 3721.1437 and 3721.1438:  <b>Amend</b> 21.12.3.2 - Landscape Concept Plan - Burwood Landfill to:</p> <p>3. State the:</p> <ul style="list-style-type: none"> <li>i. type of planting (species, size etc...);</li> <li>ii. Sourcing of plants;</li> <li>iii. Maintenance regime.</li> </ul>	Reject	The Crown considers that the deletion of 21.12.3.1 - Landscape Concept Plan addresses the Crowns concerns.	<p>Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 &amp; 8.1 - 8.2</p> <p>Ms Kimberley Rolton, paras 10.1 &amp; 10.2</p>

22	Crown Submission Point 3721.1439: <b>Amend</b> 21.12.3.2 - Landscape Concept Plan - Burwood Landfill to: 4. Present in A4 landscape format (to improve readability).	Reject	The Crown considers that the deletion of 21.12.3.1 - Landscape Concept Plan addresses the Crowns concerns.	Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 & 8.1 - 8.2 Ms Kimberley Rolton, paras 10.1 & 10.2
23	Crown Submission Point 3721.1440 and 3721.1441: <b>Retain</b> Planning Map 13 as notified.	3721.1441 - Accept		Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 & 8.1 - 8.2 Ms Kimberley Rolton, paras 11.1 & 11.2
24	Crown Submission Point 3721.1442 and 3721.1443: <b>Amend</b> Planning Map 20 to ensure consistency with the area identified in the Proposed Land and Water Regional Plan.	3721.1443 - Accept in Part	The Crown considers that the GIS layers and mapping are accurate.	Ms Nardia Yozin, paras 1.6(a), 7.1 - 7.5 & 8.1 - 8.2 Ms Kimberley Rolton, paras 11.1 & 11.2
Stage 3 Further Submission				
25	Crown Submission Point 5030.138 Support 3723.913 amendment to Rule 21.12.2.2.1(P2)			The Crown continues to support this amendment.
26	Crown Submission Point 5030.139 Support 3723.267 addition of a new Permitted Activity Standard to Rule 21.12.2.2.1			The Crown continues to support this amendment.