

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

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

AND

IN THE MATTER of the Specific Purpose
(Burwood Landfill and
Resource Recovery
Park) Zone Proposal
(Stage 3)

**CLOSING SUBMISSIONS FOR CHRISTCHURCH CITY COUNCIL
ON THE SPECIFIC PURPOSE (BURWOOD LANDFILL AND RESOURCE
RECOVERY PARK) ZONE PROPOSAL**

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 **Simpson Grierson**
Barristers & Solicitors

P M S McNamara / T R Fischer
Telephone: +64-9-977-5144
Facsimile: +64-9-977-5203
Email: tim.fischer@simpsongrierson.com
Private Bag 92518
SOLICITORS
AUCKLAND 1141

1. INTRODUCTION

1.1 At the hearing on 9 December 2015, the planning witnesses for Christchurch City Council (**Council**), the Crown, and Burwood Resource Recovery Park Ltd (**BRRP Ltd**) were directed to prepare an updated redline version of the proposal ("updated redline version"). The Council filed the updated redline version on 10 December 2015.

1.2 In the updated redline version, the twin objectives of the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone (**Zone**) in Chapter 21.12 of the proposed Replacement District Plan (**pRDP**) are:

21.12.1.1. OBJECTIVE: EFFICIENT OPERATIONS

The Burwood Resource Recovery Park and Burwood Landfill are operated efficiently, recognising their significance in supporting earthquake recovery in a way which minimises adverse effects on the environment.

21.12.1.2 OBJECTIVE: PROGRESSIVE RESTORATION OF THE BURWOOD LANDFILL

Progressive restoration of the Burwood Resource Recovery Park and Burwood Landfill for open space purposes following the completion of earthquake waste processing and disposal activities.

1.3 The updated redline version reflects a consensus between the only parties to present evidence at the hearing as to the wording of the two objectives for the Zone, and the supporting framework comprising three policies and rules setting out permitted, controlled and non-complying activities in the Zone.

1.4 In summary, the proposal facilitates the ongoing operation of the Burwood Landfill and Burwood Resource Recovery Park, in recognition of the critical role they play in Christchurch's recovery from the Canterbury earthquakes; while at the same time managing key potential effects such as noise and providing for progressive restoration of processing and disposal areas.

2. RESOLUTION OF OUTSTANDING ISSUE IN RELATION TO CONSISTENCY WITH LAND AND WATER REGIONAL PLAN (LWRP)

2.1 The supplementary evidence of Ms Rolton and opening submissions for the Council highlighted an issue of potential inconsistency between:

- (a) Rule 21.12.2.2.1 P1 in the pRDP to the extent that it provided for disposal of earthquake waste to be a permitted activity anywhere in the Zone (including the parts outside the existing Burwood Landfill site) subject to compliance with activity standards; and
- (b) Rule 9.5.18 of the LWRP, which effectively prohibits the discharge of earthquake related residual demolition waste, liquefaction silt, and infrastructure waste onto or into land in circumstances where contaminants may enter water on sites outside the "Burwood Landfill Special Purpose Site" as defined in the LWRP i.e. the existing Burwood Landfill site.

2.2 All parties including the Canterbury Regional Council (**CRC**) now agree with the approach suggested in Ms Rolton's supplementary evidence on behalf the Council, namely to permit the disposal of earthquake waste on both the existing Burwood Landfill site and Site B, but not other sites in the Zone (i.e. Sites C and D).¹

2.3 The closing submissions of counsel for CRC dated 16 December 2015 advise of CRC's recommendation to the Minister for Canterbury Earthquake Recovery (**Minister**) to amend Map 9.2 of the LWRP to include Site B within the Burwood Landfill Special Purpose Site. The submissions state that CRC will advise the Hearings Panel and parties as soon as it receives a decision from the Minister on the recommendation.

2.4 If/when Site B is added to the LWRP, then inclusion of Site B in permitted activity standard P1(a) in rule 21.12.2.2.1 of the pRDP will clearly not be inconsistent with the LWRP.

2.5 On the other hand, if the Minister decides not to add site B to the LWRP, the position is less clear. However, for the reasons set out in Ms Rolton's supplementary evidence, it is submitted that inclusion of

¹ The Burwood Landfill site and Sites B, C and D are shown in Attachment D to Ms Rolton's evidence in chief and Exhibit 1 produced at the hearing.