

1. My full name is Nicholas Karl Geddes and my experience and qualifications remain as set out in my Statement of Evidence dated 5th June 2020.

Traffic

2. The evidence of Traffic Experts is that the intersection of SH6 and Victoria Flats Road requires upgrading. There is no formal authorisation from NZTA that these upgrades will be accepted nor approval from QLDC in relation to the required improvements on the local road. Without acceptance, the volume of traffic associated with CCCL's re-zoning submission appears unmitigated and there is still potential for a loss of service and safety that will have a direct and adverse affect on the existing road network which SRL relies upon for the efficient and continued operation of the landfill.

Noise

3. The CCCL re-zoning submission has been amended to prohibit residential activities within the landfill buffer. This removes the issue I identified in my evidence in relation to the landfill having to reduce its authorised noise emission levels.

Reverse Sensitivity

4. Stage 2, phase 3 and 4 of the landfill operation as consented¹ places the active face of the landfill no more than 35m from the boundary of CCCL re-zoning submission. The evidence of Dr Rissman² confirms the characteristics of the landfill site that make the site sensitive to odour accumulation where the landfill buffer is an important mitigating factor³. Locating the activities listed in the CCCL re-zoning submission 35m from the future active face of the Landfill results in the occupation of the landfill buffer by some 3,480 members of the public per day where it is highly likely they will be exposed to odorous trace gases and this inevitably will lead to a significant increase in the number of odour complaints⁴.
5. I disagree with Mr Giddens who believes industrial activities in this location are the most compatible activity to coincide with landfill operations⁵. I agree with rebuttal comments of Mr Place⁶ in regards to reverse sensitivity and I maintain that these reverse sensitivity

¹ Statement of Evidence, Nick Geddes, 5th June 2020 – Appendix 3.

² Statement of Evidence, Dr Clint Rissman, 5th June 2020 at paragraphs [3.1-3.5].

³ Statement of Evidence, Dr Clint Rissman, 5th June 2020 at paragraph [5.2].

⁴ Dr Clint Rissman, Statement of Evidence, 29th May 2020 at paragraph [5.2].

⁵ Statement of Evidence, Brett Giddens, 5th June 2020 at paragraph [111].

⁶ Section 42A Report of Luke Place at paragraphs [9.57 - 9.58].

effects will make consenting Landfill activities more complex and whether via the consenting process or otherwise it will be inevitable that there will be complaints and pressure to constrain or limit Landfill activities which compromises operational efficiency, long term viability and the capacity of the landfill to cater for the future disposal of the District's solid waste. For these reasons, I find that the CCCL re-zoning submission is contrary to the provisions of Chapter 30 as identified in the table attached to this summary.

6. The Utilities Chapter 30 is a District Wide chapter and a relevant consideration for the CCCL re-zoning submission in relation to reverse sensitivity effects upon the landfill, as the Landfill is by definition a *waste management facility*⁷ which is a *utility*⁸.
7. In summary, I believe it is prudent to take a careful and long term view as to the appropriateness of the CCCL re-zoning proposal where the most appropriate response may be to avoid potential reverse sensitivity effects by avoiding the industrial zone and rejecting the submission in the first instance.

Nick Geddes

12th August 2020

⁷ ODP / PDP Definitions "Waste Management Facility".

⁸ ODP / PDP Definitions "Utility".

Proposed District Plan		Comment
Chapter 30 – Energy & Utilities		
<p>The Purpose of PDP Chapter 30 Energy and Utilities states:</p> <p><i>It is recognised that while utilities can have national, regional and local benefits, they can also have adverse effects on surrounding land uses, some of which have been established long before the network utility. <u>The sustainable management of natural and physical resources requires a balance between the effects of different land users. However, it is also necessary that essential utilities are protected, where possible, from further encroachment by incompatible activities which may lead to reverse sensitivity effects.</u> This chapter therefore also addresses requirements for sensitive uses and habitable buildings located near to utilities. (my emphasis)</i></p>		
1	Objective 30.2.5, the growth and development of the District is supported by utilities that are able to operate effectively and efficiently.	<p>For the reasons stated under headings: <i>Traffic</i>⁹, <i>Noise & Odour and Reverse Sensitivity</i>¹⁰ contained in the body of my SOE I find that the proposed re-zoning by CCCL is contrary to the provisions listed 1-5.</p>
2	Policy 30.2.5.2 (b), ensure the efficient management of solid waste by providing landfill sites with the capacity to cater for the present and future disposal of solid waste.	
3	Policy 30.2.5.3, recognise the future needs of utilities and ensure their provision in conjunction with the provider.	
4	Objective 30.2.6, the establishment, continued operation and maintenance of utilities supports the well-being of the community.	
5	Policy 30.2.6.5, manage land use, development and/or subdivision in locations which could compromise the safe and efficient operation of utilities.	

⁹ Statement of Evidence, Nick Geddes, 5th June 2020 at paragraphs [24 – 29]

¹⁰ Statement of Evidence, Nick Geddes, 5th June 2020 at paragraphs [36 – 44]