**Memo in Response to Agenda Item from Brooklyn Residents Association (BRA): Investigation of Alternative Fill Sites**

**Notice of Requirements: Transport Impact Assessment**

The Notice of Requirements (lodged 15 September 2017) included a transport impact assessment that responded to two construction methodological options:

* Option 1 involved stockpiling of excavated fill on the playing fields only and hence removal from site of the surplus excavated material (approx. 31,000 m3 of insitu material); and
* Option 2 involved permanent raising of the playing fields by up to 1.5m and a corresponding reduction in the quantity of excavated material to be removed from site.

Section 3.4 described the heavy vehicle route between the site and the Southern landfill. Section 4.3.3 provides the assessed impact on the wider network beyond the affected roads in Mt Cook which is less than minor. This assessment provided for both options.

**Submission from BRA**

A submission was made by Sam Donald on behalf of the BRA via email on 27 October 2017. The submission provided in principle support for the need for more reservoirs in Wellington, whilst querying the size and location of the reservoir. The submission proposed an alternate solution involving a 17.5Ml reservoir being constructed under one of the playing fields, with anther of a similar size elsewhere in the Town Belt.

Assuming the proposed alternate solution was fundamentally flawed, the submission provided support for retention of excavated material on site through raising of the playing fields. The submission also made suggestions for amendments to the playing fields including artificial surfaces and wetlands.

**NOR Update & Hearings**

Following receipt of submissions on the NOR, and further work in response to the submissions, an update to the NOR was submitted on 29 January 2018. The update set out 6 options that had been assessed in relation to the proposed raising of the playing fields and the related impacts on earthworks related heavy vehicle movements.

The principal effect of the update to the NOR was to withdraw from the application the proposal to raise the lower field and to revise the allowable hours of operation for earthworks related heavy vehicle movements to exclude weekends.

Further to the receipt of submissions, a petition was received that had been signed by the majority of Rolleston St residents entitled ‘More Trucks Please’. In summary the petition requested removal of the proposal to raise the playing fields, citing a preference for the short-term affects of earthworks related heavy vehicle movements over the permanent effects of raising the playing fields. Raising of the playing fields had been investigated, and allowance made in the NOR, primarily to mitigate transport effects on Rolleston St residents (who were deemed most affected by the proposed construction traffic). Accordingly, WWL advised the commissioners during the hearing that raising of the upper playing field was no longer part of the proposal.

**Pursuit of Alternate Solutions**

Although we have consent to remove the surplus excavated soil to landfill the project has continued to look at alternative solutions.

The project team, in collaboration with council, have made some early investigations, to identify potential disposal sites that the future contractor may consider.

**Ngauranga to Petone Cycleway**

The proposed cycleway between Ngauranga and Petone includes for a marine reclamation and seawall upgrade. The project team engaged with the NZTA N2P project in June 2019 to assess whether the excavated fill may be suitable for the reclamation and whether the timing of the excavation activity might align with the N2P project timescales.

Upon looking at the project timelines, with consent lodgement for N2P mid-2020 and commencement of excavation for the reservoir in late 2020, it became clear that N2P will not achieve a sufficient level of certainty of proceeding to justify receipt and stockpiling of the surplus excavated material. A decision on the consent is not expected until 2021 and may be subject to subsequent appeal to the environment court.

**Macallister Park/Liardet Street Playing Fields**

Following the quarterly Southern Landfill (SLF) Community Liaison Group (CLG) meeting in July 2019, and in response to concerns raised by BRA, the project team investigated the idea to repurpose the excavated material by re-levelling Macallister Park (Liardet St).

The investigation concluded that while there would be benefit to re-levelling the field that has some minor subsidence this was outweighed by the anticipated dis-benefits.

The dis-benefits included the following:

* Increased cost:
	+ The surplus material may need conditioning (treatment such a crushing) to make the material suitable for the proposed purpose.
	+ The laying of surplus material would require removal of topsoil and existing drainage systems and reinstatement of same. It is expected some of this removed material would need to go to contaminated landfill due to the HAIL status of the playing field (as an ex-landfill site and treatments to maintain the playing field surface).
	+ The site is anticipated to continue to subside and hence time and effort will be required to establish a broader remediation scope of works which does not feature within the long-term plan for the park (there is no funding allocated for works to this playing field).
	+ The activity to remediate the playing fields would require consent under the RMA. In the absence of being integrated with a council playing field remediation programme, confirmed with user groups, this may potentially delay the project and have cost implications.
* Community impacts:
	+ The activity to transport fill to Liardet St and the construction works to remediate the playing fields would impact Liardet St residents, a community group largely unaffected by the reservoir project currently.
	+ There would also be an increased impact on other stakeholder groups already impacted by the reservoir: sports field users, road users, Iwi, etc.
	+ Further local playing fields would become unavailable, exacerbating the temporary loss of the playing fields in Prince of Wales Park.
	+ A full assessment of effects would be required under the consenting activity.

**Centreport Port Rehabilitation**

In February an enquiry was lodged with Centreport as to whether our surplus excavated material may be suitable for the ongoing port rehabilitation activities (remediation of subsidence from Kaikoura earthquake). Centreport have expressed some interest (although no commitment) and are currently reviewing the relevant geotechnical information.

**Alternative Landfills**

There are other authorised landfills in the Wellington region that may have a requirement for ‘clean’ fill under their current operating requirement. Removal to other authorised landfills will be suggested to the future contractor.

**Summary**

The project team has considered a number of alternative reuse and disposal options for excavated surplus material. No suitable and feasible alternative option has yet been identified s.

The project team remains open to consideration of suitable and feasible alternative reuse and disposal options, working with the future contractor. Should a suitable and feasible option be identified and confirmed by the contractor this will be communicated to the BRA.