Submission Form 16 to the Otago Regional Council on consent applications

This is a Submission on (a) limited notified/publicly notified resource consent application/s pursuant to the Resource Management Act 1991.

Submitter Details:
(please print clearly)

Full Name/s:	[redacted]		
Postal Address:	[redacted],		
		Post Code:	[redacted]
Phone number:	Business:	Private:	[redacted]
	Mobile: [redacted]		
Email address:	[redacted]		

I~~/ we wish to **SUPPORT /**~~ **OPPOSE** / ~~submit a **NEUTRAL**~~ submission on (circle one) the application of:

Applicant's Name:	
And/or Organisation:	Dunedin City Council
Application Number:	RM 20.280
Location:	Smooth Hill
Purpose:	Land fill

The specific parts of the application/s that my submission relates to are: (*Give details)*

In relation to freshwater preservation – consent is requested to discharge leachate and waste water onto land that directly feeds into a freshwater source that leads to the Brighton beach, a public life guarded popular swimming beach. (pg 20 Smooth Hill – Assessment of environmental effects for updated design). (National Environmental standards for fresh water – took effect 4 days after DCC submission, would have been ruled out immediately).Risk of flood due to the affected waterways, catchment area of the tip site and associated water controls – the assessment provided in the submission (appendix 9) reports on one single event in 2020. A full assessment is required, including the potentila impact of climate change.

Landfill close to an international airport within the required 13kms, a hazard due to potential bird strike. This is unsafe and limits the potential expansion and use of the Dunedin airport. (page 59 ORC notification report), page 5 Guidance material for land use at or near aerodromes, www.aivation.govt.nz.

Discharge waste on location, including dust, gas and odour to air – environmentally unsound and hazardous to wildlife and the enjoyment of the area. Many native species of birds, lizards and insect life will be affected by this activity.

Gas build up and discharge – the site is within a forested area and risk of fire is significant – there has been a house fire in the location which was challenging for the local volunteer firebridge to extinguish. Earthquake risk – Geotech assessment – risk of an event that could cause gross contamination of the waterways (Appendix 6 – geotechnical factual report). The Akatore fault has been identified and the proposed smooth hill site is within the affected zone (https://www.odt.co.nz/lifestyle/magazine/shaky-ground). Odour generation – the DCC have not followed the generally accepted minimum separation distance of landfills from residences, specifically referencing Auckland Council separation distance of no less than 1km (Page 17, 7.2 odour Further s92 response final 5 August 2021). The assessment 30 years ago no doubt had no residences this close to the proposed site, and evidences that the DCC have not provided a current assessment.

The consent requests approval to remove water from a natural water source – water is scarce in the area, and should feed the local waterways, not industry. Native flora and fauna will be impacted as water is already scare in the vicinity. Likewise the diversion of the natural water away from the local stream and natural waterway is counter to all local legislation preserving freshwater ways, yet alone the impact on the life forms in the water of Otokia creek. Contaminated water will eventually discharge on to the Brighton beach, impacting the wellbeing and health of many.

Removal of natural native wetlands when there is a specific DCC and government programme to preserve native wetlands – this is completely contrary to waterways and wetlands requirements for farmers, and the three waters recent initiative. (national environmental standards for freshwater). Lizards – loss of habitat (ORC Notification recommendation report pages 58 – 61).

There has been no attempt to complete a social impact risk assessment, based on international best practice. The suggested social impacts relate to the jobs created only, totally inadequate in todays environmental risk assessment requirements. The wellbeing and health of the local community has not been considered at all.

My submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views*).

I do not support any aspectof the application – it is harmful to the native flaura and fauna, the individuals and the wellbeing of the entire wider Dunedin community. The information gathered on the site is 30 years old and no longer applicable to the current environment and age. Surely the DCC as a guardian of the land and resources has a responsibility to fully investigate and risk manage all aspects of its resources. There has been no consideration of alternatives – the DCC has left this to the last minute to address, evident by the rushed application, to recreate an outdated rubbish tip similar to the Green Island dump. Recent events have shown that this type of refuse management is no longer suitable for todays environment. With climate change, severe weather events and the natural earthquake risk, the ability to contain and manage the proposed landfill without harming the environment is impossible, and will be to the detriment of the locals, and the wider Dunedin community. There are other options – for example, the AB Lime site to the south, already consented and the use of trains to transport the waste would further reduce green house gas emissions and improve safety of state highway 1 south, by the removal of trucks from the road.

The public use of the location for the wellbeing of everyone will be restricted – hunters, walkers, horse riders, mountain bikers, dog walkers will all be forced out of the area. The smell will detract from the location, and the Dunedin public will have to find alternative locations.

The turn off from State Highway 1 to McClaren gully road is a known high risk crash site with the current crash rate, yet alone when trucks are frequently turning up the road. The Otago Rally has a world famous gravel road stretch along the top of Big Stone Road – as Big Stone road will need to become a secondary route, the sealing of the road will destroy this world class race way.

The fact that the DCC did not have this information on the LIM report is disingenuous. As purchasers, we are required to check the LIM as due diligence. The smooth hill landfill will considerably devalue our property, that we have built up over the last 15 years. During this time, we have protected native bush, replanted 100's of natives, encourage birdlife, been fully responsible for our own water, waste water, solar hot water heating and rubbish – ironically we don't qualify for rubbish collection! We built at Brighton for the lifestyle – horse riding, kids outside, gardens and home grown produce, only to be insulted by a rubbish dump close by, with no indication of the DCCs intent. Indeed, the DCC tried to avoid consultation and public submissions on the proposal.

Our enjoyment of the beach and surroundings will be greatly diminished – I feel stressed, angry and concerned that our investiment for our children's future is in jeopardy due to this unknown development. As with all parents, we hope to leave our patch in a better state than we purchased it, including in todays housing market, some capital for the children to purchase their own slice of NZ paradise – this is looking less and less likely and causes me undue stress and concern.

Having spent some time in the coastal waters research diving, the impact on the underwater environment causes me concern. Leachate from the tip will travel the natural water way to the beach, and the ocean. This area of coast, from the water, is exceptional for fish and seaweed. The seaweed in particular captures CO2 gases, and a reduction in the amount of seaweed has a negative impact on climate change.

I frequently ride my horse in the forest and note that the forestry has spent significant sums of money to plant natives 5 meters either side of Otokia creek. This is a lovely space with bird life, and clear water that is just delightful to escape to after work.

The beach to the south of brighton beach is kept pristine with lots of walkers – you hardly ever see any plastic on this beach and it is very clean. To see waste, and worse still, smell waste or unseen bacteria than can make us sick, is unbelievable, particularly as it is fully preventable.

I seek the following decision from the consent authority *(give precise details, including the general nature of any conditions sought)*

NO consent to this proposal. I recommend that they fully investigate alternative options of waste management, including reducing waste, recycling, composting, and environmentally sound alternatives to manage waste in a mature and environmentally conscious manner.

I:

- √ Wish to be heard in support of our/my submission
- ☐ ~~Not wish to be heard in support of our/my submission~~

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

- √ Yes
- ☐ No

I, **am not** (choose one) a trade competitor* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

**If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, **am** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

a) adversely affects the environment; and
b) does not relate to trade competition or the effects of trade competition.

I, **do** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do** request* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have** served a copy of my submission on the applicant.

14 November 2021

Signature/s of submitter/s
(or person authorised to sign on behalf of submitter/s)

(Date)

Notes to the submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public, including publication on the Council website. Your submission will only be used for the purpose of the notified resource consent process

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to submissions@orc.govt.nz