

**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: Brian John Chalmers

Postal Address:

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██████████

Post Code:

████

Phone number:

Business:

Private:

Mobile:

██████████

Email address:

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I wish to **OPPOSE** the submission on the application of:

Applicant's Name: Dunedin City Council

And/or Organisation:

Application Number: RM20.280

Location:

Smooth Hill

Purpose:

Land Fill

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

**1. Water Contamination****2. Air Contamination****3. Reduction in Quality of Life****4. Geo technical (Earthquake risk)****5. Aviation Risk**

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)*.

1. I live in Ocean View adjacent to Brighton Beach. My extended family from both New Zealand and Australia make regular use of Brighton beach for swimming and surfing during the summer months. I am concerned that leachate containing toxins and other run-off from the site will eventually find its way via Otokia Creek to Brighton Beach and the sea. Brighton Beach is the

most popular beach on the Otago coast-line for family surf and beach recreation, offering as it does a safe and sheltered spot for elderly people and children of all ages.

Brighton Surf Life Saving Club has a growing membership who spend many hours training at the beach for public rescue duty and for their inter-club events. To subject these community minded young people (and generations yet to come) to the risk of toxic leachate from the proposed site would be reprehensible.

The tidal current flow at Brighton has a northerly set with an average flow rate of 1.5 knots (source New Zealand Tidal Stream Atlas pub by the Hydrographic Office of RNZN). This means that any discharge attributed to leachate from the proposed site reaching the sea at Brighton will also contaminate Ocean View beach and the beach through to Lawyers Head.

**2.** Wind directional flows of all strengths from the WSW – SSE sector for the area of the proposed site comprise an average of 3284 hours per year (source: worldweather.com). This means that for 37.6% of the year there is potential for airborne odour and particulate matter to be conveyed by wind to the Brighton and Ocean View communities. It is common-place for land-fill operations of this type to have fires occurring in the material deposited. Such a fire may well require outside assistance to bring it under control. Brighton has a fire appliance manned by volunteers. They have limited capacity to respond during working hours as most of the members are employed outside the district. The three nearest full-time manned fire stations are Mosgiel (20km), Lookout Point (26km) and Dunedin Central (33km). Delays caused by travel times would be crucial to successfully combat dangerous toxic fumes from such an event. Commercial pinus radiata forests abound in the area of the proposed site. These forests are tinder dry in the summer months. A fire emanating from the land fill and spreading into these forests will result in the loss of jobs and millions of dollars of financial flow into the Otago community. Is it worth the risk?

**3.** In our extended area of residence we enjoy a high quality of life due in part to the complete lack of industrial activity of any sort. During winter months in periods of calm weather the microclimate of Taylors Creek valley area produces an inversion layer which is exacerbated by cold air coming off the sea. Any odours or fumes coming from land fill activity will be trapped in this area during winter thus causing annoyance and potentially breathing difficulties and respiratory illness for residents of Edna St, Hare Rd, Kayforce Rd and Bennett Road.

**4.** In recent years geo-scientists have gleaned much new information on the hitherto almost unknown Akatore Fault. This fault lies only 6 kilometers from the proposed landfill site.

The University of Otago's chairman of earthquake science, Prof Mark Stirling, has been quoted as saying that such recent rupturing makes it an "active fault". (source ODT 26/9/2020)

The same geo-technical expert believes the likely earthquake magnitude will be of the order of **7.4**.

By comparison the Christchurch earthquake in September 2010 centered 40 kilometers (25 miles) west of Christchurch, in the plains near Darfield had a magnitude of only **7.1**.

The Akatore Fault earthquake projection is a staggering **1.995** times greater in intensity. (source USA Geological Service web site).

The Akatore is a maverick fault, judging by its recent history. It has ruptured in the past 10,000 years but these were irregular. The two most recent large earthquakes occurring about 1000 and 700 years before present, just the blink of an eye when it comes to geological time. Can the applicant give any sort of guarantee that earthquakes from fault movement will not irreparably

rupture the clay liner base membrane of the land fill thus releasing leachate into Otokia Creek and the beach\_at Brighton?

5. Momona Airport is only **5** km from the site proposed by the applicant. The recommended minimum distance by IATA, ICAO and NZ Civil Aviation Dept for land fill activity is **13** km.

The runway at Momona is approximately in a North-South configuration. In winds from the northerly quarter, commercial flights arriving from the north, descend over the proposed land-fill site and when sufficiently far south turn 180 degrees to starboard and land on runway 03. This flight path is selected to avoid the high terrain of Mt Maungatua (almost 900m). In winds from the southerly quarter, flights heading to northern airports take off on runway 21 and on climb-out, turn 180 degrees to port and overfly the proposed site. Again this is to avoid the high terrain to the west of the airport. Bird strike will become a serious risk to commercial aircraft. Recreational fixed wing flights observe the same flight paths but at a much lower altitude, thus making bird strike even more likely. Recreational flights from the Otago Aero Club at Taieri airstrip also overfly the proposed site.

Frequent rotary wing aircraft activity in the area includes at least twice daily flights by Otago Rescue Helicopter Trust aircraft undertaking flights to and from accidents and rescues throughout Otago. Medical transfers are also flown to and from Dunedin Public Hospital. The flightpath from Invercargill Hospital to Dunedin and return is directly over the proposed site. Many flights have been tracked by me since moving to Ocean View and it is common to observe helicopters transiting over the proposed site at altitudes under 1500 feet.

Bird strike on the propellers or jet engine intakes of fixed wing aircraft is an extreme emergency but pilots can and do recover the situation by gliding to a suitable landing spot. Flight 1549 landing into the Hudson River in January 2009 is probably the most well known example of a survivable recovery from multiple bird strike.

However bird strike on the rotors of helicopters is catastrophic, as auto rotation to a survivable landing from altitude is almost impossible **resulting in the certain death of all onboard.**

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

**NO CONSENT**

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I wish to be heard in support of my submission

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

I, **am not** 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** 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** 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.

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**Signature/s of submitter/s**

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

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(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**

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