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: Ms Maria Sydor

Postal Address: [redacted]

Post Code: [redacted]

Phone number: Business:

Private: [redacted]

Mobile:

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: *Application No. RM20.280*

Location: Corner of Big Stone Road and McLaren Gully Road, Brighton, at about NZTM2000 1385764E 4905608N

Purpose: Proposed Smooth Hill landfill

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

Appendix 7 Economic Assessment Report

Appendix 11: Ecological Impact Assessment Report

My/~~Our~~ 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 live in Ocean View and work on an orchard near Outram. I have been involved in community projects helping to organise events and artistic endeavours. My objection is to the whole proposal to build a landfill at Smooth Hill. My reasons are:

a) As stated in the application, the adverse effects on the environment associated with the application are more than minor, so it is very concerning that the council is pushing ahead at

great speed probably to obtain funding from central government under the guise of a 'shovel-ready' project. However, the project is unlikely to get government funding as it does not comply with National Environmental Standards for Freshwater – an initiative of the current government. As a result of the haste, a number of important steps have been missed in the development of this application (detailed below).

b) The council has admitted that they have not evaluated the Smooth Hill site against any other possible sites in Dunedin since 1992. This is a serious omission in procedure. The situation around Smooth Hill has changed considerably since 1992 when it was decided that the site was suitable to be the next landfill site. For instance, there are more residential and lifestyle residences built around the area now, the application now does not comply with the new National Environmental Standards for freshwater, and the existence of the Akatore fault was not known in 1992. The council statement that nothing has changed since 1992 and that they would likely make the same decision today is extraordinary.

c) Since 1992, environmental and climate change issues have become increasingly important elements when considering all construction projects. The major earthworks and road construction for the landfill, which is at the headwaters of the Stream flowing into the Otakia Creek, will drain wetlands and result in the loss of habitat for a number of at-risk species of lizards, skinks, eels, fish and birds. The cost of remediation, mitigation and offsets proposed will undoubtedly increase the construction costs significantly. Surely, the council can find a better site that has fewer environmental impacts.

d) There has been no investigation into the effect of the localised phenomenon of sea fog which covers the hills above the coast and stretches out over the sea. Unless you live on the coast, from at least Westwood through to Brighton and beyond, you would not know about this phenomenon as it does not seem to feature in weather forecasts, to my knowledge. It is highly likely that this sea fog will trap the smells of the landfill underneath this long cloud. This sea fog/low cloud can last for days. It is quite noticeable from Outram as it looks like the top of the hills are covered with a thick white blanket all the way from Saddle Hill to Taieri Mouth. Any smell would definitely spoil my enjoyment of living in Ocean View and would force me to move away from the area and my friends. The smell would also stop visitors coming to Brighton for recreational purposes.

e) There has only been analysis of surface water flows. It is well known that this range of hills are littered with many underground streams which sometimes exit unexpectedly in residential basements. My neighbours have a permanent pump working to extract water from their basement from such an underground stream. More analysis is required.

f) The council seems to have omitted performing a standard cost benefit analysis for the project. As stated in Appendix 7 section 4.4 *"Earlier work prepared in advance of this application focused on a financial assessment of different options before Council. They did not focus on the wider economic effects of the alternatives*". The economic assessment currently undertaken was merely to look at whether the landfill would pay for itself over the life of the landfill. A proper cost benefit analysis should have been conducted analysing alternative sites. One alternative that should have been evaluated is the option of not having a landfill at all. If the council was serious about achieving zero waste through recycling and reuse, and advocating for a circular economy, then a landfill has no long-term role. It perpetuates the status quo requiring no-one to change their behaviour. People are intrinsically lazy and are only forced to find different ways of doing things when something drastic happens. The money would be better spent on the council being pro-active in finding people with the ideas to make their aspirational goals a reality.

g) It is alarming to read that much of the design of the landfill has not been finalised. The type of liner has yet to be determined. The liner is critical to the long-term safety of the community due to the potential for contamination of surrounding groundwater if it fails. The economic assessment is therefore mere guesswork. Costs will rise.

h) The economic assessment has used estimates for a steady population rise which is clearly out of line with what is happening in many parts of the world. Europe's population is declining. More pandemics are on their way. The economic assessment's assumption on population and economic growth for Dunedin is way off.

i) There seems to have been no end-of-life planning conducted for the landfill. I can see no costs included for decommissioning. Or are we leaving this for our grandchildren to pay for?
j) Given that it is well known that all liners fail at some point, some earlier than others, and failures have catastrophic impacts on groundwater and soil. Plastic liners deteriorate over time, allowing leachate to pass through into the soil and groundwater. Likewise, clay or compacted soil liners become increasingly porous over time. Depending on how carefully liners are constructed and maintained, defects, holes, patches, and cracks may cause landfills to leak almost immediately and there's no way to repair liners once they leak. The risk that landfill will contaminate the surrounding area at some point in the next 50 years is high especially as it is located on the top of a hill and any leakage would cover a wide area.
k) There is no fire management plan developed. Landfills are prone to fires due to methane build up and, more recently, lithium batteries. A landfill in Wellington has had several fires caused by batteries in the last year.
l) Most countries have laws around where landfills can be located. They usually state that they cannot be built close to inhabited areas, farmland, airports, earthquake fault lines or sources of drinking water. Smooth Hill is very close to farms and life-style properties both on the coastal side and on the Taieri plain side. It is 4.5 kilometres from Dunedin Airport and 6 kilometres from the Akatore fault-line. The Taieri River is within 2 kilometres and many farms use bore water for irrigation. The Smooth Hill site is therefore not a suitable location to build a landfill by most countries' standards.

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

No consent should be given for the building of a landfill at Smooth Hill.

The council should conduct a new feasibility of options. The options should include: a) no landfill or b) a number of smaller landfills that are more suited to specific refuse types e.g. building waste, toxic waste, green waste for composting etc. All these options should not be close to residential housing, on the top of a hill, close to the sea, near a river, near a wetland or near a fault line.

The council must produce a full cost benefit analysis, include a fire management plan, include a decommissioning plan, provide analysis on underground water flows and analyse the impact of sea fog on trapping odour over residential properties.

I/~~we~~:

☐ 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/~~we~~ will consider presenting a joint case with them at a hearing.

☐ **Yes**
☐ No

I, **~~am~~/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/am not~~/could be** (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/~~do not~~** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** 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~~/have not** served a copy of my submission on the applicant.

Maria Sydor | 13/11/2021

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