

**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: Paula Lee Hasler, with support of Cycling Otago Inc.

Postal Address:

████████████████████

████████

Post Code:

██████

Phone number:

Business:

Private:

Mobile:

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Email address:

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

Applicant's Name: Dunedin City Council

And/or Organisation: Dunedin City Council

Application Number: RM20.280

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

Purpose: Landfill

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

**1. Impact for recreational users.****Document: Application - Appendix 15 - Integrated Transport Assessment Report**

I completely disagree with the statement in clause **2.2.4 Active transport modes** (Application - Appendix 15 - Integrated Transport Assessment Report).

*“There are no explicit provisions for walking or cycling on the surrounding roads. McLaren Gully Road and Big Stone Road are predominantly used by logging trucks, and therefore, walking and cycling on these rural roads is not encouraged”.*

Cycling Otago Inc. (affiliated to Cycling New Zealand) is a key advocate for cycling in the Otago region, and supports both recreational and competitive cyclists as part of its membership base and the wider cycling community. I am the former President of Cycling Otago Inc., and have approval from the current Committee to submit this application. I am an active / competitive road and off road cyclist with extensive links to the Dunedin and Otago cycling community. I can confirm that **Big Stone Rd, McLaren Gully Rd**, and the surrounding gravel road network is very popular with off road cyclists.

These gravel roads are regularly used and it is misleading to state otherwise; the application documents gloss over the impact the proposed landfill would have for recreational users of the area by essentially stating that there is no issue to be considered. I have personally led Gravel group rides on these roads, they have been used in Brevet events (i.e. Tuatara 1000) with interconnecting roads used in the annual Coastal Classic MTB race. The Gravel riding demographic is currently experiencing the most growth in cyclist participation across all ages, buoyed by large scale uptake of ebikes and the perceived dangers of road riding. Having a gravel road network linking the Brighton and Taieri regions is a significant recreational asset for Dunedin. The impact of the proposed roading infrastructure changes to support the proposed landfill would completely ruin this asset – namely by sealing the roads and the subsequent use by rubbish trucks and associated vehicles. Given the rarity of local gravel roads, and in an areas of significant landscape importance and value, if the proposal is accepted, this would be a major loss to the growing Dunedin / Otago cycling community.

I note that the submission documentation states that **Brighton Rd** will be used only as an “alternative access option”. Other sources have informed me that this is not true, or at the least there is nothing to stop contractors using Brighton Rd and Big Stone Rd as a preferred route once the landfill was operational. Brighton Rd is an extremely popular road for cyclists, including riders in training for road and time trial racing. At present, there is almost no trucking activity on this road, meaning that it is generally safer to use than other areas which are used as truck networks.

There are several cycling, running, and multi-sport events which use Brighton Rd and the Taieri Mouth area, such as the Coastal Classic, Cycling Otago Inc. Time Trial series, Dean Cooksley Memorial Handicap, and Taieri Mouth Handicap, and the Taieri Mouth Multi-sport and Triathlon etc. Regular use by rubbish trucks would significant increase the STMS risk and potentially affect the ability for organisers to hold such events. The increased danger to everyday recreational users – cyclists, pedestrians, surfers using Brighton Rd and lay-bys, etc. would be significant if large scale rubbish truck activity became normalised.

## **2. Impact on the environment**

### **Document: Application Assessment of environmental effects**

The negative impact on the environment and in particular habitat for indigenous species is concerning and should not be overlooked as only “low to moderate”. From the *Application assessment of environmental effects*:

- Several identified areas of significant indigenous vegetation and significant habitat (4.6.1 p.28) supporting some at risk indigenous species, i.e. lizards such as southern grass skink and jewelled gecko, and indigenous birds such as the eastern falcon.
- Species with moderate to high ecological value in vegetation community, for example, Kanuka (4.6.1 p.36).
- Affect on watercourses and freshwater fish species habit, for examples eels (4.6.4 p.33)

### **Impact on Landscape and Natural Character (4.8 p34)**

The proposal for a landfill in a landscape that clearly has citywide importance, should be opposed:

*The overall significance of the Taieri Slopes was identified in the review as Medium-High with citywide importance. Collectively, the rural hillsides that surround the Taieri Plain were described as having inherent visual amenity, landscape and ecological values. They include iconic landmark features of citywide importance, founded on strong cultural associations. The diversity of natural remnant vegetation covering the collective hillsides and emerging valleys provide an important green backdrop to the modified Plain below.*

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)*.

The application is **opposed** due to the negative **impact on recreational users** of the affected roads and area; and due to the **negative environment impacts** which will **negatively alter a landscape area** with “*inherent visual amenity, landscape and ecological values* and clear significance to the city.

As above, the impact on recreational users of roads affected by the proposal are significant, but have been downplayed as a non-issue in the proposal documentation. The loss of the McLaren Gully Road and Big Stone Road gravel road network would be a substantial loss of recreational asset to the city. And there is no surety that Brighton Rd will not become the preferred transport option in the future. Brighton and the Taieri Mouth area are popular recreational destinations and this impact should not be overlooked.

The negative impact on the environment and landscape is concerning. This is an area of significance to the city which should be protected.

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

The consent authority should **decline** the proposed landfill site. An alternative site closer to the city / appropriate roading infrastructure should be chosen. Even the cost alone of “upgrading” McLaren Gully Road and Big Stone Road, and exit off the State Highway make this proposal unsustainable.

If the proposal is approved, there needs to be conditions enforced on the use of Brighton Rd as a transport link for landfill trucks and associated vehicles.

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** (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. **Neutral**

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



13<sup>th</sup> November 2021

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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**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)