

**BEFORE THE COMMISSION
APPOINTED BY THE OTAGO REGIONAL COUNCIL**

UNDER the Resource Management
Act 1991 (RMA)

IN THE MATTER Of an application by Dunedin
City Council for resource
consent being processed with
reference RM20.280

BY **BIG STONE FOREST
LIMITED**
Submitter

STATEMENT OF EVIDENCE OF SARAH RAMSAY

DATED 6 MAY 2022



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STATEMENT OF EVIDENCE OF SARAH RAMSAY

Introduction

1. My name is Sarah Ramsay. I am a director of Big Stone Forest Limited (**BSFL**) which owns a property on Big Stone Road across from the proposed Smooth Hill Landfill site. This property has been my family home for 10 years. I live there with my husband Alex, our Son Finn and our puppy Brownie.
2. The purpose of this evidence is to explain how we live, how special our environment is, and our concerns about how the application will affect our lives. In this evidence I set out:
 - (a) The physical proximity of our home to the landfill site,
 - (b) How our way of life depends on the surrounding environment, and
 - (c) The potential effects of the application on that environment.

Our Home

3. We chose to live here to match our outdoor lifestyles. At the time my husband was dog sled racing and trail running, and I was participating in multi-sport and mountain biking endurance events.
4. We wanted to live off the grid, building a different more sustainable lifestyle. And we both wanted space from the City, a more remote and isolated setting offering respite from the intensity of our working weeks. Also, as I travel extensively for work, the proximity to the airport was appealing.
5. I had first hand experience of how much work was involved in lifestyle blocks with livestock, fencing and pasture to maintain – the relative low maintenance and ‘wild’ feel of living in a forestry block suited our busy lifestyles.

6. Most importantly, we wanted our forever home where we could raise a family and become part of the community. I grew up in the country and going to rural schools, Big Rock School has an excellent reputation, and we liked the unique beachy/rural village community that Brighton offered.
7. We positioned our home out on the point of the ridge that runs through our property. We chose this location so that we were as far away from the road as possible, for the stunning coastal views and so we would become enclosed by the forest – invisible from the road once the trees were established.

Recreation and Community Life

8. At least three days a week I go mountain-biking and Alex runs. We take off from our doorstep and our training grounds are Big Stone Road and the surrounding forestry trails. We can be gone for hours at a time.
9. We inevitably come across other bikers, runners/walkers or horse riders. Many people come from Brighton or town to bike and walk around Big Stone Road and the McClaren Gully forestry track.
10. It is a safe area to bike in the weekends and evenings, with very little traffic on the road. What traffic there is, is locals who are well aware of the blind corners and hazards of the road, and the importance of being cautious due to sharing the road with recreational users.
11. Horse trailers are seen every weekend parked at the Big Stone, with riders trekking along the valley. The map below shows the popular loop route alongside the Otokia headwaters down in the valley and Big Stone Road in purple. The red 'squares' illustrate where people park. The blue zone is the proposed landfill site.



12. Traffic on McLaren Gully Road is a major hazard for recreational users. Whilst any additional traffic along the hazardous shingle Big Stone Road is a huge concern. We understand that all traffic is proposed to go up McLaren Gully – but how do DCC propose to stop independent commercial operators from ‘zipping’ up Big Stone Road if that is more convenient. Particularly those carrying waste that does not go through the transfer station.
13. More recently the Turner Family whose boys are Fin’s age have started biking around Big Stone Road too, so we enjoy joint family bike rides and adventuring to each other’s houses.
14. We enjoy peaceful summer evenings and weekends working on our forestry block and maintaining our extensive native garden. I propagate native plants from the roadside and forestry for planting. I exchange natives with several of our neighbours.
15. As a family we regularly go on walking and biking adventures around the area. We bike down the valley and explore the Otokia headwaters for frogs, eel and elusive koura.

16. We walk our puppy up to the corner of McLaren Gully Road, or in the opposite direction to the high point of Big Stone Road, every single day twice a day.
17. Community wise, Fin is at Big Rock School. The school has a symbiotic relationship with the Brighton environment. The kids are regularly exploring the Otokia, volunteering with the Otokia Marsh & Habitat Trust to plant and conserve the creek and having swim and surf days at the beach.
18. Brighton is a special place. In summer we spend a lot of time at the Beach or at Taieri Mouth – as a family we all swim, surf, jetski and fish.
19. No trip to the beach or Taieri Mouth is without an impromptu gathering of families. The Brighton community is entwined by the school, pre-school, Surf Club and Brighton Club.
20. More often than not we gather at the Brighton Club in the weekends, the kids have ice-creams and chips from Azezah at the store, while parents catchup to the backdrop of local musicians having a jam. It's a social vibrant community, bound together by the water.
21. Now, we face the prospect of a landfill at the end of our driveway - every time we leave to and from work, we go for a run or bike ride, or we take our dog for a walk we are likely to get (at best) a strong wiff of rancid rubbish, harassed by resident seagulls, listen to the noise of trucks and diggers and negotiate the road with large rubbish vehicles.
22. It will completely undermine our enjoyment of area anymore. I can imagine starting our family weekend rides by holding our breath as we ride past the landfill – delightful. In fact I am concerned that inhaling the odorous air will be detrimental to our health, most especially my son Fin.
23. I am equally concerned about the potential for landfill contaminants to leach into the Otokia. I will not allow Fin to swim or play in the Creek anymore. Many other parents of Fin's friends feel the same way. Because we don't trust that the DCC can prevent dangerous leachate

from contaminating the Creek. In fact the application is clear that landfill leachate will escape through the landfill liner. Given that is going to happen I have little confidence that it will not make its way into our dearly loved waterways. This concern has been elevated by the input from Mr Rumsby and Ife who are more circumspect about the efficacy and longevity of the proposed landfill liner system.

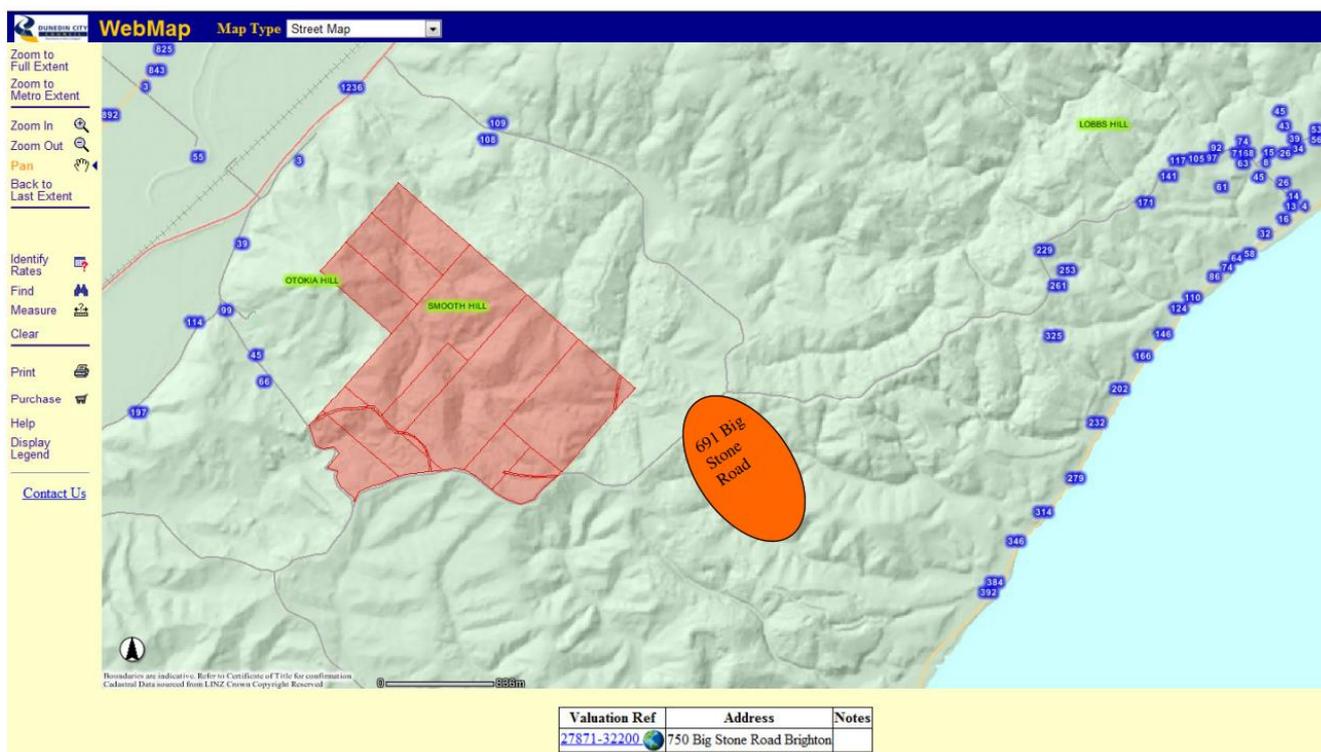
24. Regardless, all the assurances in the world that the landfill is safe, will not alleviate the community's anxiety of 'what could be in the water'. We simply do not trust the DCC and they have exacerbated that lack of trust through their outright refusal to engage in meaningful consultation with our community.
25. If our trust of the water that binds our community together is lost, then where does that leave us?

Nature and Wildlife

26. One of our life goals for our home is that by the time we harvest the forest, we'll have the luxury of being able to completely replant it as a native block.
27. We have planted out the non-forestry areas of our section exclusively in NZ Natives. Well over 2,000 plants to date. 10 years ago it was bare clay, with no birdlife whatsoever.
28. Today native Falcon float on the wind around our house. I sit and watch them from our lounge window. In bed at night we hear the morepork calling. Cheeky fantail chase us down the driveway and follow us down the road on our walks. Tui's get bolder every season and feed off the flaxes around the house. We see kakariki, kereru, bluebirds and warblers take their fill of berries and new growth from our garden of hebes, kanuka and flaxes.
29. We regularly walk, run and bike through the valleys from McLaren Gully towards Brighton, and from Big Stone Road down to Brighton Taieri Mouth Road. Both valleys are full of birds feeding and drinking from the wetlands.

Site Selection

30. The world has changed since the designation was granted 30 years ago, so too has the area surrounding the landfill site. It now has residential neighbours.
31. When we purchased we were made aware of a proposed nearby landfill development by our real estate agent – he said “not to worry it’ll never happen, and if it does they’re going to access it off the motorway”. As you might imagine, we were concerned to ensure we understood what this might mean.
32. So we did our own due diligence to ensure it was far enough away that it wouldn’t affect our property:
 - (a) we purchased a LIM report, which did not make mention of the landfill.
 - (b) When I searched ‘Smooth Hill’ itself on a map it appears two valleys/hills away much further down McLaren Gully Road,
 - (c) I contacted the Council and spoke to Ian Featherstone in DCC planning who directed me to the affected site map as being 750 Big Stone Road (shown below). This is clearly NOT immediately adjacent to our property (shown as the orange oval in the image).



33. So we were completely taken aback and horrified when we discovered that the Smooth Hill Landfill development was proposed immediately at the end of our driveway with as little as a 10m buffer between the Landfill itself and the Road. It literally could not be worse.
34. The original designation documents from 1998 refer to the implementation of a 'residential buffer zone'. There has been a complete failure by the DCC to implement this – which should have included updating neighbouring property LIM reports with the designation and refusing the subdivision of large tracts of Big Stone Road from large scale rural forestry into smaller rural lots in 2010/2011.
35. Had the actual site been identified in our LIM report or the Council employee given us the correct information I can unequivocally say we would never have created our wonderful home retreat here.
36. In my view our knowledge and respect for the importance of protecting our natural water resources has evolved significantly since the landfill was designated. I would like to think is a site selection exercise was undertaken today Smooth Hill would simply be off the table. is sited at the headwaters of the Otokia Creek a highly valued water body, a tributary into our community of Brighton and one of Dunedin's most popular swimming and surfing beaches.
37. We have read that some 3000 Blackback gulls in Green Island will be looking for a new home when Green Island Landfill closes. Given these birds move regularly from Green Island to the far edges of the Taieri Plain – it's completely predictable that at least some of them will find their way to Smooth Hill.
38. Once there, I am sure they are also likely to avail themselves of the habitat offered by the upper Otokia Creek. We already see the impact of gulls and ducks on the health of the lower creek in Brighton, if the population were to expand their defecation will have an adverse effect on ecosystem.

39. We and all households along Big Stone Road live off rainwater, we are concerned that gulls will increasingly defecate on our roof and contaminate our water supply.
40. What will happen to the revived and healthy population of native birdlife around our property and the landfill site. The new landfill poses a risk:
- (a) Seagulls will drive away the native birdlife
 - (b) It will attract rodents, which are well known for their adverse impact on our native birds.
 - (c) Increased traffic will see more Falcons run over on the roads – as they're regularly seen on the road over roadkill such as possums.
 - (d) Birds will eat the rubbish and be poisoned / choke.
 - (e) Leachate may get into the wetlands and poison the birds drinking from them.
 - (f) Persistent organic pollutants may accumulate in the wetlands, becoming toxic to the flora and fauna, as well as to families like ourselves that explore and fish these areas.
 - (g) Not to mention the bird management plan expressly says they will shoot and poison birdlife. I am concerned this will affect not just seagulls, but other native birdlife too.

Fire Risk

41. In Spring gale force nor-westerly winds often lay us siege in our home. It has been so bad on occasion that I have been close to moving my family to town to wait for the winds to die down. I get very anxious that if the Forestry around us were to alight that I would not hear or smell a fire in time to evacuate.
42. Our home is surrounded by 30ha of forestry, we are immediate neighbours of the landfill – with only the span of the road and a proposed 10m planting break between the edge of our forest and the tip-face.

There is only one road to our house, Big Stone Road, which in either direction for at least 4 kilometres has established forestry on both sides of the road. Our neighbours on either side of us are 1.5-2kms away, separated by forestry. We have cut a 4WD escape route through the forestry at the rear of our property out into our neighbour's paddock, from there it is approximately 5km across country to get to the coastline and Brighton Road.

43. We have already had first-hand experience of the challenges of location in the event of a fire. In 2020 our neighbours Chris and Sandra Rampe's shed caught fire. My husband Alex was first on scene to help them evacuate, it took another 15 minutes for the first engine to arrive.
44. It was a cold May day with light wind and light rain. Even so the flames were 20m high and it took six engines and 30 firefighters to put it out, with the 12m x 12m shed being a total loss. Thankfully, the weather conditions were kind and it did not spread.
45. Allowing 5-10 minutes for volunteers to get to the station, it then takes 15 minutes from Brighton volunteer station to our location, it's 35 minutes from the City.
46. It is well reported that fires happen in landfills. In October 2021 Nelson's York Valley landfill reported "fires sparked by dumped batteries at the York Valley landfill had become "an increasing phenomenon" with almost 30 over the past 12 months." ¹
47. In 50-100km howling nor-westerlies a spark from the landfill into our forest could be all that it takes and it could be catastrophic. No significant emergency fire response would be available on-site for at least 35 minutes. I find this a totally unacceptable increase in the risk to my family and our neighbour's safety.

¹ <https://www.stuff.co.nz/national/127807899/binned-battery-blazes-ignite-call-for-proper-disposal>

Odour, Noise and Dust

48. On a perfectly still idyllic day, of which we get many, we can hear cyclists and walkers talking as they cycle along Big Stone Road up past the McClaren Gully turnoff and along past our neighbour's. Sound travels up the valleys. We even hear the hum of the train from the Taieri from time to time.
49. Diggers, machinery and equipment, their engine noise, beeping and the sounds of rubbish being crushed and pushed around will be incredibly intrusive.
50. We already have some insight into what it will be like. Over the years there have been several forestry harvesting operations in the area. They are disruptive, but we can tolerate it because they have confined hours and are relatively short lived. They only operate on weekdays and finish by 4.30pm. Even then, the constant beep beep beep in the morning is invasive, and on the occasions when I have been working from home I can hear the machinery beeping, yelling of workers and crashing/breaking of trees clearly from our house.
51. We chose to live in working forestry area, so we can accept that there will be harvesting operations every 5 years or so.
52. In contrast, the proposed operational hours of Smooth Hill is every day of the week. Having the noise of a major industrial operation next door to us permanently is going to have a huge impact on our lives. It will be intolerable, it will ruin our quiet enjoyment, especially in the weekends and evenings when we are often outside.
53. Such noise will also disrupt all the recreational users in the weekend, horse riders, cyclists and runners cannot enjoy the area to the backdrop of a noisy industrial operation. Traffic to and from the landfill will be a constant intrusion from which there will be no respite.
54. Further the landfill bird management plan includes dispersal methods such as pyrotechnics, pistols, distress callers and start guns. Whilst we can often hear hunters shooting around us and you would expect that in a rural environment to an extent, the frequency of it is likely to be

completely different. In all likelihood it will also need to occur outside of normal operational hours in order to adequately address the concerns of the Airport.

55. Operation during the weekends and evenings after 5pm also poses significant road safety risk to recreational activity. Increased traffic on McLaren Gully Road and Big Stone Road will put horse riders and cyclists at risk – particularly those who frequent the McLaren Gully / Big Stone valley forestry track loop.
56. In my view the operational hours are inappropriate given the nature of activities and level of enjoyment that the community gets from this area. It demonstrates the disregard that the Council appears to have for us. Constraining operational hours strikes me as an easy thing for them to do to try and minimise their effects on us.

Landfill Operation

57. The Applicant proposes to manage effects through the Landfill Management Plan. Throughout this consent process to date there has been very little detail in that plan which does not provide assurance that the Applicant understands what that best practice is or whether that will be sufficient to manage adverse effects.
58. “To be confirmed” is not an acceptable approach. It leaves us in a vacuum and with a complete lack of confidence about what is going to occur.
59. The applicant has proven that they are not capable of putting adequate planning, systems and processes in place merely to complete an application – let alone be trusted with being granted a consent that leaves the operational management of the landfill effectively at their discretion. In my view the detail of the Landfill Management Plan must be available before this consent can be considered for granting. It establishes operational baseline, so that any further amendments or changes to it are in aid of improving management and reducing effects.

Conclusion

60. Our property and the environment that surrounds it is highly valued, widely utilised and sensitive. Consent should not be granted.
61. In my experience as an independent Chartered Professional Director and Director & Owner of an ISO:9001 Accredited organisation, no business is successful without a risk mitigation plan and clear key performance indicators. In the landfill's case, for successful operation of a \$50+ million operation, one would expect at the very least a detailed management plan, key metrics that will be monitored and reported on, and a detailed complaints and non-conformance process.
62. The applicant has already proven that they have failed to follow their original plan, 30 years in the making, by failing to enforce a buffer zone and jeopardising their development with allowing neighbouring residential development.
63. Complaints about the applicant's existing operations at Green Island are well documented and their failure to provide for a City landfill operation between the end of the Green Island consent and forecast Smooth Hill operation speaks further to their incompetence.
64. Failing an overwhelmingly impressive Landfill Management Plan, the applicant's past performance is the only indicator of their future performance, and this Applicant's performance has been severely lacking.
65. Therefore if consent is granted, critical controls should be in conditions of consent rather than 'to be confirmed' in a Landfill Management Plan that are subject to change without notice. Such controls must include:
 - (a) size of the tip face – limited to 300m² as per the Application documents (not expanded to 1000m² as more recent evidence seems to suggest). It is my understanding the minimising the size of the open tip face is one the key controls to minimise land fill gas escape, reduce area for attracting birds and the like. They commenced this process claiming it would be 300m² and they should be held to that.

- (b) Operating hours limited to 8am – 5pm Monday-Thursday and 8am – 4pm Friday which at least lets us have some peace and quiet in the evenings and weekends.
 - (c) Controls on traffic movements.
 - (d) Fire management plan.
 - (e) Prohibition on discharge of putrescibles so that odour issues are likely reduced and bird management is less of an issue.
 - (f) More robust leachate monitoring requirements as discussed by our experts witnesses.
 - (g) Landfill gas monitoring and controls on composition to assist in managing fire risk; and
 - (h) More detailed and precautionary Waste Acceptance Criteria.
 - (i) A Bond so that we can confident funds are available if the worst was to happen.
66. At the end of the day we don't need this landfill. There are numerous other options available. As I think a number of my fellow witnesses have said – why not devote the energy and money from this project to actually achieving the Council's Zero waste target. Other interim options are available and would likely help drive changes that would accelerate achievement of Zero Waste.
67. The Council's persistence on old world solutions is hugely frustrating, particularly given the significant cost it will impose on my family and our wider community. I implore the Commissioners to make the brave decision and refuse this application.

Sarah Ramsay

Big Stone Forests Limited

6 May 2022