

### **ORC Hearing – Additional points by Viktoria Kahui, 20 May 2022:**

- I would like to respond to comments by Greg Akehurst (Economic Assessment Report) and comment on the Programme Business Case (PBC) process which identified the landfill site.

#### **Lack of social impact study.**

- The commissioners asked Greg Akehurst why the economic assessment report does not follow the Treasury's Living Standard framework and/or does not have a social impact study (a point raised by myself and other submitters).
- Greg Akehurst's response was that under the Resource Management Act s32, all environmental, economic, social and cultural effects must be considered when evaluating a proposal. He commented that the LSF framework is primarily used at national level for budget bids which have to be considered from wellbeing perspectives.
- The evaluation of the landfill proposal falls to the DCC who has to apply the RMA criteria of environmental, economic, social and cultural effects. This is left to the experts, and the Economic Assessment report considers the economic effects only.
- The economic effects in the report are measured by employment, gross output and value added. The report points out that value added is a measure of wellbeing (p.21). However, the Living Standard Framework emphasizes that wellbeing should also be measured along other domains, such as environmental amenity, work, care and volunteering, safety etc. Similarly, the RMA requires the consideration of social effects.
- Estimating the effects of the proposed landfill on employment and value added is insufficient to capture the social impacts on the Brighton community.
- Why has no social impact study been commissioned by the DCC?
- The use values of the marsh to Brighton residents include the enjoyment of kayaking, swimming, nature viewing, education; and ecosystem services such as flood regulation, water purification and biodiversity. Residents also hold other values such as bequest values (leaving a healthy ecosystem behind for future generations), and many ascribe an intrinsic value to the Creek which refers to the right of the Ōtokia to exist and flourish.
- There is no dedicated report for the social impact of the proposed landfill. There is no mention anywhere else of the impacts of the proposed landfill on the values held by the Brighton community.
- There is no discussion or mention of the perceived risk of leachate from a landfill at the headwaters of the Ōtokia Creek on these values for residents downstream.

### **More information on criteria and sensitivity analysis on choice of landfill site required.**

- Christopher Henderson supplied additional evidence during the hearing stating that the DCC has 'explored multiple options for waste disposal during feasibility studies conducted as part of the business case process for Smooth Hill'.
- The DCC Meeting Notes from Monday 11 February 2019 provide an attachment describing the Programme Business Case (PBC) process in 2018.
- It states that 'there had been no change in the relevant criteria upon which the Council had made its decision to select the Smooth Hill site in 1992, and that there had been no significant change to the site or surroundings that necessitated reassessment of other sites'.
- It states that 9 potential programmes were developed and tested through multi-criteria analysis, workshops and discussions with stakeholders. The 9 programmes were scored against alignment with the investment objectives, along with other criteria.
- More than half of the programmes included the development of Smooth Hill, three included waste export and one waste to energy disposal.
- Did stakeholder discussions include the Brighton community? Where and who participated in the workshops? What are the multi-criteria results and how sensitive are they to changes in the levels of criteria?
- On p. 5 of the Economic Assessment Report, it is stated that a sensitivity analysis has not been applied as it forms 'a key component of distilling the options originally'.
- No sensitivity analysis is provided regarding the robustness of the multi-criteria analysis.
- These details need to be provided, given that it is the single deciding process for the choice of the landfill location.