

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: David Murray Hanan

Postal Address: [REDACTED]

Post Code: [REDACTED]

Phone number: [REDACTED]

Email address [REDACTED]

I **OPPOSE** the application of:

Applicant's Name: Dunedin City Council

And/or Organisation:

Application Number: **RM20.280**

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

Purpose: Construction and operation of a landfill

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

The landfill fails to meet the basic assessment tests under RMA. These are simply:

- *Socially it is not wanted,*
 - *Culturally at odds from Iwi values of Kaitiakitanga.*
 - *Environmental setting and the ability to control discharges is highly dubious at best.*
 - *Economically – not sustainable – Alternatives available which have not been explored (1992 Landfill Futures report is irrelevant)*
- 1) *Economically, this site is not viable. When the waste stream is analysed, assuming Dunedin undertakes an organic recycling collection (currently being tendered), how much waste is actually estimated to be deposited at this site annually, considering the disposal price to recover the cost of the landfill's construction? If most of Dunedin's organic waste, including biosolids was processed differently (est to be 35,000 tonnes); construction and demolition was taken to the Burnside landfill;*

contaminated land was deposited to either Burnside or Temuka or Invercargill; plastics, card newspaper and metals all have recycling options. I would suggest that the total volume is likely to be less than 15,000 tonnes considering the current waste stream is 50,000 tonnes. With an investment of \$56 million, with effectively only potentially 15,000 tonnes of residual waste that will be deposited annually, the cost of disposal would be over \$300.00 per tonne, significantly more than the cost of disposal to AB Lime.

The economic reality, now that AB Lime has an unlimited consent for the disposal of waste, is the landfill is simply not viable for the residual amount that would require disposing. The cost of carting residual waste to AB Lime, (of which the carbon footprint can be offset by planting trees) is significantly lower than what it would cost per tonne to develop a new landfill.

A new landfill is simply another source of methane which only serves to exacerbate GHG production, which globally, at the recent COP26 most nations signed a pledge to cut the production of by 30%.

- 2) Culturally, the siting would cause irrevocable harm. The landfill would be a stressor on this already vulnerable environment, the placement of a landfill in this environment essentially 'tipping the scales', further diminishing Iwi's relationship with the area and preventing the local Runanga, in their mana whakahaere roles, from being able to exercise kaitiakitanga and practise their culture and traditions in a way that is consistent with tikanga and their own mana motuhake. Māori have strong spiritual bonds to the land, Papatūānuku, the Earth Mother. She provides unity and identity to her people and sustains them. Māori consider that Papatūānuku sustains all life, and that they are spiritually connected to her. Māori regard land, soil and water as taonga (treasures). Māori are the kaitiaki (guardians) of these taonga, which provide a source of unity and identity for tangata whenua (local people). If there are options not to cause further damage or harm to Paptuanuku then these options should be taken first.*
- 3) From the local community's perspective, it is clear that since 1992 this area has changed. To rely on a 29-year-old options study to assess whether this is the best location for a landfill is not meeting the obligations of the Act. The study has not reflected changes in the Brighton community nor reflected the recent change to the AB Lime consent.*
- 4) The landfill will smell - How will these odours behave under local meteorological conditions has not been and cannot be fully understood as it is impossible to model*
- 5) The landfill will damage sensitive ecosystems*
- 6) Birds (gulls in particular), are likely to be an air traffic hazard.*
- 7) The landfill is likely to damage a sensitive wetland*
- 8) Truck movements will increase through Brighton causing adverse effect to that community*
- 9) The receiving environment will change dramatically*
- 10) Visual impacts will be significant.*
- 11) The landfill will create dust discharges to air*

- 12) *The landfill has questionable geology - buried topsoil deposits have been identified*
- 13) *Henley Breccia formation is highly variable*
- 14) *There is a reported unknown risk on liner performance under seismic deformation*
- 15) *Dispersive clays are not suitable as liner materials. These can be stabilised but can crack reducing performance. How these clays perform after stabilisation has not been modelled. Importing clays as an alternative would be a significant project risk and could add significantly to the cost.*
- 16) *The site has high levels of ground water <5m*
- 17) *The site has poor geological bedding*
- 18) *The site is located on ground that shows evidence of previous slope failures.*

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 oppose the whole application for the following reasons:

- 1) Economically not viable
- 2) Culturally not acceptable
- 3) Socially not wanted
- 4) Environmentally – The landfill will have a significant impact:
 - a. Air will be degraded
 - b. Dust is likely
 - c. Geologically questionable material – slips in the area are identified
 - d. Liner performance under adverse conditions is therefore dubious
 - e. Odours are inevitable
 - f. Increase in traffic due to greater volumes of heavy trucks using roads not fit for that purpose
 - g. High Ground Water level which is likely to be affected if liner leaks
 - h. Visual impact will be large
 - i. Birds are likely to be an issue for aircraft
 - j. Does not meet New Zealand’s International commitments to reduce GHG emissions.

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

The application be declined. I

- 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 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/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** 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.

Signature/s of submitter/s



(Date) 3 November 2021

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

