

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: Dr Rebecca Cumming

Postal Address:

Post Code:

Phone number:

Business:

Private:

Mobile:

Email address:

I/ we wish to **OPPOSE** the submission on (circle one) 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

Purpose: Proposed Smooth Hill Landfill

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

I am deeply concerned by the environmental impacts associated with the proposed Smooth Hill Landfill site and do not believe the DCC has addressed these to an acceptable standard in its application. The timing of the proposal and application just prior to the recent National Environmental Standards for Freshwater is highly unethical and strongly suggests that the council is aware of the environmental impacts, but is set to fast track this process with full knowledge that it is going to breach these new regulations. Otago takes pride in its natural environment and I would expect the Otago Regional Council to recognise the environmental risks in the proposed plan issues and act proactively based on the future vision for this region. Whilst I understand the need for a new landfill site in the future, its exact location can only be decided after environmental, financial and social concerns have been identified and a robust mitigation plan put forth – so far this process has not been transparent and should have been done PRIOR to the selection of a new site.

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)*.

As a resident of Kuri Bush, I am well aware of the ecological significance of area and the impact the Smooth Hill Landfill site will have on our community and strongly oppose the application. My main concerns if this is approved are:

1) Destruction of Smooth Hill Wetland and surrounding habitat that will cause decline of native flora and fauna (e.g. lizards, falcons, native fish/eels, which are currently threatened). As I actively seek to create habitat on my property by protecting and restoring native bush, this is very disheartening and contrary to the hard work of many in the local community to protect these species.

2) A lack of understanding and clarity regarding of hydrology of this area and therefore the direction and flow of leachate and contaminants. This could impact the surrounding areas of Brighton, Henley, Kuri Bush and other areas within this large catchment. History shows that even with the best mitigation practices in place, catastrophic events lead to containment breaches (e.g. torrential rain and placement of site on Akatore Fault/earthquakes). Myself and my neighbours all have springs and/or creeks on our properties, if there is a containment issue will leachate contaminate my water and land? This question can not be answered with any confidence and an action plan by the DCC to assess hydrological patterns has not been put forth. The DCC should have sought independent expert advice and conducted geological testing before it submitted its application.

3) In addition to the environmental concerns, the proposed site is also unsuitable given the close proximity to the Dunedin International airport and the very real risk of bird strike. International tourism is vital to our economy and to jeopardise our reputation and risk lives over a poorly placed landfill site is disappointing.

4) As landowner bordering forestry adjacent to the site, the increased fire risk caused by the landfill (gas etc.) is alarming and has not been addressed in a management plan or acknowledged at all by the DCC's proposal. This forested area is already a tinderbox and the increased risk and lack of firefighting resources nearby directly threatens my livestock, farms and the lives of myself and my neighbours.

5) I drive along Otokia-Kuri Bush Road most days, through the forestry towards Henley. This road is already problematic as there are often forestry trucks and cars coming around blind corners. I can not see how this road can be made safe given the surrounding forestry and significant cost

and resources that would be needed to bring it to and maintain a safe standard. It is unclear how the DCC intends to resolve this issue and the risk to those living locally and to those going to the landfill site to drop off refuse would be very high, especially as rubbish trucks, locals, forestry trucks and a constant stream of cars towing trailers would have to navigate along steep and winding terrain.

6) Increased dust and rubbish blowing off trailers and trucks along the roads and the site itself would create an eyesore and increase sedimentation covering the surrounding areas (esp. waterways). The topography of this site is not suitable for landfill as it is close to the top of the ridge and experiences high winds most days. The odour from the landfill site is also likely to travel a considerable distance, directly effecting me, residents in Brighton and those in other surrounding areas.

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

I expect the ORC consider the safety of those in our community and to make its decision in accordance with new National Environmental Standards for Freshwater, therefore rejecting the application outright. As the ORC is bringing in new environmental legislation for landowners, it is going to be much harder to convince farmers and lifestyle block owners of the value and need for change if it allows the DCC to breach this framework by allowing a landfill to be built in an ecologically significant wetland site. The ramifications and ethics of such contradictory practices must be considered.

I 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

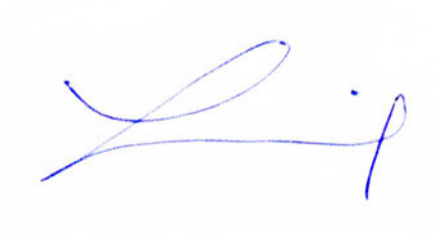
I **am not** a trade competitor* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

**If trade competitor chosen, please complete the next statement, otherwise leave blank.*

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



15 November 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