

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: Hayden Patrick Breese

Postal Address:

Post Code:

Phone number:

Business:

Private:

Mobile:

Email address:

I/ we wish to **OPPOSE** 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, at about NZTM2000 1385764E 4905608N.

Purpose:

To oppose establishment of Smooth Hill Landfill

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

- Discharge Permit to discharge waste and leachate onto land, and discharge landfill gas, flared exhaust gases, dust and odour to air, and to discharge water and contaminants from an Attenuation Basin and sediment retention ponds, for the purpose of the construction and operation of a Class 1 landfill.
- Water Permit to take of up to 87 m³/day of groundwater, and use of up to 50 m³/day of groundwater, for the purpose of managing groundwater collected beneath a Class 1 landfill.
- Water Permit to divert surface water within the Ōtokia Creek catchment for the purpose of the construction and operation of a Class 1 landfill and associated road realignment works.

- Water Permit to dam water within an Attenuation Basin for the purpose of the construction and operation of a Class 1 landfill.
- Land Use Consent to alter, reclaim, and place structures on, the bed of waterbodies and wetlands for the purpose of road realignment works.

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 entire submission of the Dunedin City Council and its application as above...

We need to be smart city, turning waste into energy

The Dunedin City Council is negligent in its duty of care by continuing to pursue outdated and harmful waste management practices. It is clear that best practice waste management practice includes establishing a 99% recycling strategy. A target of zero waste has been demonstrated as achievable by countries like Sweden. Dunedin has an opportunity to become a leader national leader with a world leading, modern, sustainable, waste management process.

Countries like Sweden, convert their waste into energy. Dunedin City needs to look at how it can be smart with its waste, generating energy and protecting the environment at the same time.

Waste is a resource and a landfill is an environmental disaster waiting to happen. Developing a new landfill in this day and age, close to the nearby beachside community of Brighton, is like building a new coal factory beside a solar farm. We have the technology and know-how. We need abundant energy and we have the waste resource to generate it. Our council have chosen to bury our waste because it's the easy option. It's easy to dig a hole and forget about it. If established, the landfill effect on the natural environment will be significant and long term. Dunedin will increase its carbon footprint, releasing methane and toxins into the atmosphere, accelerating climate change. But it doesn't have to be this way...

We place our natural environment and our children in harm's way

Landfills release toxins, contaminating soil and groundwater, and emitting dangerous greenhouse gases. While being bad for the environment, these toxins pose significant and sufficient risk to the Brighton area, which has established use case as a spectacular recreational natural beach environment. The Brighton beach and surrounds is at risk of contamination from the proximity of the proposed landfill. Children play in the Otakai creek and will continue to do so regardless of whether pollution exists. This poses are significant risk to health and the community.

Leachate can contain high levels of ammonia resulting in nitrate, reducing oxygen in nearby water sources. This effectively will create dead zones where animals cannot survive.

Emissions from landfills pose a threat to the health of those who live and work around landfills. A study in New York found that there is a 12% increased risk of congenital malformations in children born to families that lived within a mile of a hazardous waste landfill site.

The Proposed Landfill will contribute to Climate Change

The release of methane gas from the proposed landfill is of serious concern. "Methane is one of the most potent greenhouse gases and a huge contributor to climate change" University of Coloradoⁱ The proposed landfill will also produce carbon dioxide and water vapor, and trace amounts of oxygen, nitrogen, hydrogen, and non methane organic compounds. These gases will also contribute to climate change.

A Water Crisis is coming and we need to be smarter

The world is on the brink of a water crises. According to the world meteorological organisation “Increasing temperatures are resulting in global and regional precipitation changes, leading to shifts in rainfall patterns and agricultural seasons, with a major impact on food security and human health and well-being,” says World Meteorological Organization Secretary-General Prof. Petteri Taalas. We must consider the implications of drawing significant water flows from the Ōtokia Creek and surrounds. The Otakia Creek is a recreational use water form. there is a significant risk of contamination which will render the water unusable by families, children and the local surf club.

A smart city has a future

The right thing to do is to develop our recycling industry and capabilities. This will create new jobs and opportunities in our city. Dunedin has an abundant natural environment and it needs to be protected. Dunedin’s image of a natural clean environment, full of wildlife can be secured for the future. We are New Zealand’s first city. We can be great. We are not the biggest. But we can be the smartest. We need to think like a smart city. A smart city that innovates and embraces best practice has a future. I propose an alternative to a landfill is a world class waste to energy plant in Dunedin.

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

To refuse approval to establish Smooth Hill Landfill _____

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 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** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

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.

I **have** served a copy of my submission on the applicant.



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

ⁱ <https://www.colorado.edu/ecenter/2021/04/15/hidden-damage-landfills>