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:	Munirah Burra		
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I wish to strongly **OPPOSE** submission on the application of:

Applicant's Name:	
And/or Organisation:	Dunedin City Council
Application Number:	RM20.280
Location:	Smooth Hill
Purpose:	Proposed Landfill Site

The specific parts of the application/s that my submission relates to are all of it in it's entirety.

I am a local and have been a residential rates tax payer of this community for over 20 years and until late 2020 had NEVER been made aware of this landfill proposal that has apparently been on the cards for the last 30 years. There has been gross omission of and next to no community communication or consultation in the 20 plus years I have owned my home. I first heard about the proposed landfill from locals living on Big Stone Road who made the effort and had the courtesy to share information with the rest of the community, via way of a flyer in my letter box.

How in the last 30 years has there not been more investigation before now to research other waste management options and put into place more robust waste reduction and management systems? This community has grown and evolved a lot in the last 20 + years.

The proposed development does not align with the DCC Zero Waste Targets. If the DCC achieve their Zero Waste Target, what are they going to do with a giant new landfill? I would propose that DCC:
A. Focus on reducing waste and extend the life of Green Island landfill through better management.
B. Export waste to another landfill – i.e. the AB lime landfill in Winton that already takes 20% of Dunedin's rubbish so that the DCC can buy themselves some time to investigate alternate sites and / or disposal methods / achieve the zero waste initiatives.

I have grave concerns of Environmental effects:

1. To the waterways

2. To wildlife

3. Odour

4. Fire

5. Bird Strike and Siting in relation to airports

6. Community and personal hauora and oranga tonutanga

1.To the waterways – water contamination. Otokia Creek originates with in the landfill and ultimately flows to the coast at Brighton main beach. Pg 20, Pg 82 Smooth Hill Assessment of Environmental Effects for Updated Design. Currently where the creek meets the sea is a highly populated and used spot by whanau with small children through out the year. ***The application does not align with the National Environmental Standards for Freshwater****. Pg 24 Appendix 9 Surface water Assessment Report- this is based on a single assessment in July 2020 which is insufficient info from which to eliminate major flood events as an environmental risk.*

2. To wildlife –'Orc Notification Recommendation Report' pages 58-61.' – Construction will result in loss of habitat to ***lizards****. There are potentially 5 lizard species, 4 at risk and declining. 'All native lizards are protected under the Wildlife Act.' Native* ***Eastern Falcon*** *breed in the area. The falcon is an at risk / threatened species.-Landfill construction will result in the permanent loss of habitat for avifauna, including regenerating native treeland …and other forest and plantation used for habitat by the at risk Eastern Falcon.* ***Fish*** *– 'high loads of suspended sediment can damage fish gills and make them more susceptible to disease or even result in mortality.'* ***Endangered Longfin Eel and Redfin Bully*** *fish species as well as at risk birds* ***White Heron and Black Stilt****) live at the Marsh Otokia Creek provides. Increased rodent populations may result in increased bird mortality.*

3. Odour -Pg17, 7.2 Odour, 'Further s92 Response Final 5 August 21' Since 1992 there have been significant changes to the area. DCC failed to put the designation on LIM reports within close proximity. There are now many homes within close proximity.

4. Fire Pg 38 DRAFT Landfill Management Plan -there is no Fire Management Plan identified. The evaluation does not elaborate to the uniquely high risk surrounding environment of high density forrest, exposure to galeforce winds and abundance of fuel in the form of gorse and forestry slash.

5. Bird Strike and Landfill Siting in relation to Airports Pg 59. Orc Notification report. Pg 5, Guidance material for land use at or near aerodromes, www,aiviation.govt.nz

6. Community and personal hauora and oranga tonutanga – during this COVID crisis people need more places they can go to connect, recharge and revitalise the mind and spirit, commune with nature – not less.

My submission is in total opposition of the landfill site. ***(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 am writing to you as an affected local - hugely distressed at the possibility of a Landfill on Smooth Hill in Brighton Dunedin.

(Points 1 & 6) I believe Brighton Beach is THE MOST family friendly beach in Dunedin, in part due to the nature of Otokia creek where it meets the ocean, being ideal for whanau with small children. The proximity of the surf life club and amenities. Brighton is a special place where people come to

recharge, reconnect and revitalise the spirit. Now more than ever during this global crisis we need to protect the special places people utilise for mental, emotional, social, spiritual and whanau wellness. My daughter grew up here, playing at the beach and creek even in winter. My adult daughter is currently stuck in Auckland in the endless lockdown being experienced there. She shared this picture of Otokia as it trickles out to meet the sea with me. It's her screensaver. Otokia and the surrounding coast line...indeed the coastlines and rivers around the world have always been her playgrounds, her link to wellness and finding calm in times of stress. Her words: 'It was my playground. It's my connection to home. I look at it and know it'll be there just the same, just reshaped by the tide when I can finally can return home. If I look hard enough I can almost taste the salt on my tongue, sand in my toes and feel the air fill my lungs and whip my hair.'

It's a struggle for many of us not to be able to connect face to face in the flesh with loved ones around the country and world during these changing times, but water connects us all. Polluting a waterway here pollutes water everywhere. It will be a day of great shame and outrage if this landfill is allowed to go ahead. The landfill proposal consumes me with worry and concern for the stella environment here. The thought that our beloved Otokia creek and beautiful surrounding coast line and wildlife could be negatively effected impacts my ability to sleep well at night.

Do you have special places in nature you go that lift you up? A garden? A tree? A water source? A favourite flower or food? Do you love them back? If your special place was threatened what lengths would you go to to protect them or would you stand by spectating while they're hurt? Brighton and it's surrounding natural environment should be treated as the taonga it is for future generations to enjoy and experience as my daughter did. I have dreams

of sharing this place with my grandchildren and greatgrandchildren in all it's natural unharmed beauty. I hope for them to create memories of kayaking down the river, observing the wildlife (point 2) catching tiddlers in nets and letting them go under the bridge, paddling in the creek, breathing fresh air unhindered by rubbish odour, walking the beaches free of waste, spotting the various birdlife along the banks and shore.

I strongly oppose the proposed Smooth Hill Landfill project. Our waterways are to be protected and maintained in better conditions than we find them for future generations at any cost. Landfill is expensive to tax payers – surely our hard earned money can be better spent to work on recycling alternatives and lead the way for a 'greener NZ' than archaic 'open dumps' that leech dangerous toxic substances into earth and ground water -polluting waterways, impacting native wild life, posing aviation flight risk (due to the close proximity of proposed site to our airport), attract pests, pose serious fire hazards and smell really, really bad.

I don't believe anyone wants a landfill in their back yard. To stop the need for landfill I do believe we all need to work together to consciously make better choices to reduce / manage waste better and move towards waste free living.

I feel disappointed, let down and saddened by what I perceive as lack of any real progressive waste minimisation or alternate recycling pre planning budgeting forethought from both our local and centralised governing bodies, as well as not standing by or living up to their advertised commitments:

(This exert is from the ORC website. I challenge the ORC to do their job and actually commit to what they advertise. Stop the Landfill going ahead at Smooth Hill in Brighton.)

What is being done nationally doing to protect lakes rivers and streams

The government is committed to stopping further degradation and to restore our waterways to a healthy state within a generation. As part of this commitment, in August 2020, the "Action for Healthy Waterways" reform package was announced. The healthy waterways reform package includes a:

- ***New National Policy Statement for Freshwater Management (NPS-FM 2020), replacing the current NPS-FM 2014***
- ***New National Environmental Standards for Freshwater (NESFW)***
- ***New stock exclusion regulations under section 360 of the Resource Management Act 1991 (RMA)***
- ***Amendment to the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010; and***
- ***Changes to the Resource Management Act 1991 to require freshwater modules in farm plans in the future.***

Some of the new rules and regulations apply now, while there is a longer timeframe for others.

Wetlands and estuaries

Otago's wetlands and estuaries are some of the most valuable ecosystems in our region, and are recognised for their ecological, cultural and socio-economic values.

I am worried that this landfill and the concerns I have raised will impact the lifestyle I have worked hard to achieve and negatively affect my mental health, that as I get older I will no longer have a place of beauty to enjoy in retirement. If I was to sell my property I would never be able to purchase a home as well suited to me as my income does not afford me to manage a bigger mortgage than I already service. I worry that Brighton will no longer be a sought after place to live and raise a family. That my mental health will be impacted by negative effects on the environment. I worked tirelessly through the last 2 lockdowns as an essential worker for others and what has kept me going and able to perform my duties during these times has been my ability to recharge, reconnect and tune my spirit in to the environment – walking on the beach, pebbling in the creek, sitting at the water's edge. Watching the sun rise and fall, planting, watching the bird life. I am exhausted, like many others, and thought of damage to my sanctuary is too much to bear. I think it would break me. Please, I beg you, don't let the Landfill go ahead.

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

1. To completely deny / reject the application for a landfill at Smooth Hill.

2. To ensure that if, ***worst case scenario,*** *consent to go ahead is given – the operational management plan leaves ABSOLUTELY NO RISK for any environmental catastrophe and comes with heavy consequences for any environmental breaches. i.e crippling fines AND criminal sentencing. For a publically available list of names of individuals and parties responsible for agreeing to Landfill application so they can be held accountable by the community and environmental law into the future. If no-one is prepared to be held accountable and have their name made public the landfill should not go ahead.*

No risk for environmental catastrophe to the waterways (Otokia Creek and Marshland and the surrounding coastline), no risk to wildlife, lizards, fish and birds, no risk of fire or odour to Brighton and Coastal residents, no risk of seagulls scavenging and dropping waste items in the surrounding coastline waters and beaches, no aviation flight risk resulting from increased scavenger birds, no risk for increased rodent population.

I:

X Wish to be heard in support of my submission
☐ Not wish to be heard in support of our/my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

X 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.

Munirah Burra — 14/11/2021

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