

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: Trish Chaplin-Cheyne and Marty Cheyne

Postal Address:

████████████████████

████████

Post Code:

██████

Phone number:

Business:

Private:

Mobile:

██████████

Email address:

████████████████

I/ we wish to **SUPPORT / OPPOSE** / submit a ~~NEUTRAL~~ submission on (circle one) the application of:

Applicant's Name: Dunedin City Council

And/or Organisation:

Application Number: RM20.280

Location:

Smooth Hill Landfill

Purpose:

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

1. National Environmental Standards for Freshwater: the application does not align with these standards (NB p.82 "Application Assessment for Environmental Effects")

2. Ecology – Native Eastern Falcon: Loss of avifauna will increase potential mortality of an already threatened species. (NB: pp. 58-61 "ORC Notification Recommendation Report")

3. Bird-strike: The close proximity of the airport to the proposed landfill poses the very real potential for airline disaster. (NB: p. 59 "ORC Notification Recommendation Report")

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).*

Our submission strongly opposes the application, on the following grounds:

1. We farm sheep/ beef on Saddle Hill. It has been a requirement of the DCC for farmers to protect waterways from stock. Over the last few years we have complied with this request by fencing any access from our property to Ōtokia Creek. It is absurd that while this is seen as a reasonable request from the DCC to landowners, this plan to protect the waterways is not reciprocated by the DCC.

2. On McIntosh Road (and surrounding forestry), we are privileged to host nesting sites for a breeding pair of Native Eastern Falcons. Due to their ground nesting habits, only 25% of young reach maturity – tough stats without further and future human interference. These are a threatened species and further removal of forestry will hasten this species demise.

3. Bird-strike: Any landfill will attract birds and in NZ this is predominantly the seagull. The proposed position for the landfill is in close proximity to Dunedin's airport and increases the risk of an air disaster. It is also to be noted, that the hill area around the landfill is used for flight training. The DCCs application includes a proposed plan to mitigate bird-strike, however mitigating is not eliminating and any risk to life is unacceptable.

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

No consent!

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, ~~w~~e will consider presenting a joint case with them at a hearing.

- Yes
- No

I, ~~am~~/**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~~/**do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I ~~do/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~~/**have not** served a copy of my submission on the applicant.



12/11/2021

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