

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: Vianney Santagati

Postal Address:

[REDACTED]

[REDACTED]

Post Code:

[REDACTED]

Phone number:

Business:

Private:

Mobile:

[REDACTED]

Email address:

[REDACTED]

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:

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

Purpose:

Landfill/Rubbish disposal

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

The loss of wetlands, and the position of the landfill in a waterway. The loss of the amenity of, and how the community perceives, the waterway and Brighton beach. The lack of consideration to future generations having to deal with the eventual degradation of the landfill and lining. The lack of a fire plan.

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)*.

1. The National Environmental Standards for Freshwater regulations states that no further wetlands should be lost. Wetlands will be lost and research has shown that attempting to construct/replace lost wetlands does not function satisfactorily.

2. The position of the landfill in a waterway which drains to Brighton Beach, one of only four patrolled beaches in Dunedin is not a good plan, as eventually whether through adverse weather advents, accidental leakage, or the eventual degradation of the liner, leachate will end up running through Otokia Stream to Brighton Beach.
3. Brighton Beach is the closest and safest patrolled beach to Dunedin. Hundreds can use the beach on a hot day and the Otokia Stream is seen as a safe place for toddlers and non-swimmers to use. The pleasure and use of Brighton Beach will be curtailed. Who wants to let their toddler play in, or their teenager surf in, water perceived as tainted by the leachate from the rubbish dump upstream? The DCC has taken no consideration of how the rubbish dump will effect the community's well being.
4. You can see from incidents on the West Coast that rubbish dumps on waterways are eventually disturbed through extreme weather events, which are predicted to rise. DCC has taken no consideration of this in the planning and situating of the rubbish dump. The DCC cannot ethically leave our rubbish to seep an/or float into the waterways for future generations to deal with.
5. I see no fire plan in the DCC's application. In the past year Wellington landfill has had 40 fires started by lithium batteries. There are houses, surrounded by forestry, within 2 km of the proposed site. How does the DCC plan to provide for their safety and the safety of the surrounding environment when the closest professional fire service is at least a 30min drive from the site? This has not been included in their plan.

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

As this is a discretionary activity, I am asking for the ORC use their full discretion to decline the DCC's application to form and run a landfill at Smooth Hill.

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

Vianney Santagati

15/11/2021

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