

**This is a further submission to the Environmental Protection Authority where the matter relates to request for change to plan where Minister has made a direction under section 142(2) of the Resource Management Act 1991.**

The plan change is the Omnibus Plan Change – Plan Change 1 to the Waste for Otago: Regional Plan.

## Part A: Further submitter details

<b>Name of organisation:</b> <i>(if relevant)</i>	Dunedin City Council		
<b>Title:</b>	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr <input type="checkbox"/> Other: (Please tick the appropriate title)		
<b>First name of further submitter:</b>		<b>Surname of further submitter:</b>	
<b>First name of contact person:</b> <i>(if different to above)</i>	Chris	<b>Surname of contact person:</b> <i>(if different to above)</i>	Henderson
<b>Home Ph:</b>		<b>Work Ph:</b>	03 477 4000
<b>Mobile:</b>			
<b>Email address for service:</b>	Chris.henderson@dcc.govt.nz		
<b>Postal Address:</b> <i>(or alternative address for service)</i>	<b>PO Box 5045, Dunedin</b>	<b>Postcode:</b>	9054

## Part B: Interest

**Only persons that come under the following categories may make further submissions.**

<p>I am a person representing a relevant aspect of the public interest.</p> <p>The grounds for saying why I come within this category are explained below. <input checked="" type="checkbox"/></p>	<p>I am a person who has an interest in the Omnibus Plan Change (PC1) that is greater than the interest the general public has.</p> <p>The grounds for saying why I come within this category are explained below. <input type="checkbox"/></p>	<p>I am the local authority <input type="checkbox"/></p>
<p>Please specify the grounds for saying why you come within the category above:</p>		
<p>Territorial authority</p>		

## Part C: Do you wish to be heard in support of your further submission?

<p>I <b>do not wish</b> to be heard in support of my further submission <input type="checkbox"/></p>	<p>I <b>wish</b> to be heard in support of my further submission. <input checked="" type="checkbox"/></p> <p>If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input checked="" type="checkbox"/></p>
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## Part D: Further submission points

If you require additional space for any question(s) please attach further documents or paper to this further submission form and clearly state your name and the question(s) you are expanding on.

<b>Name of original submitter</b>	<b>Particular parts of the submission you support/oppose</b>  <i>Please indicate whole submission or submitter point ID (e.g. 10005.3)</i>	<b>Are you in support of or in opposition to the particular whole/part of the submission?</b>	<b>What are your reasons for your support or opposition?</b>	<b>Do you seek for the whole/part of the submission to be allowed or disallowed (select one)?</b>
<b>Big Stone Forests Limited (BSFL)</b>	<p><b><u>New policy 7.4.11A (which BSFL seeks to be included)</u></b></p> <p><b><u>" 7.4.11A Manage the effect of discharges from new landfills by:</u></b></p> <p><b><u>(a) ensuring site selection avoids the establishment of new landfills in proximity to existing land uses that are sensitive to the effects of the landfill; then</u></b></p> <p><b><u>(b) designing, constructing, operating and managing new landfills in accordance with the Waste Minimisation Institute New Zealand's Technical Guidelines for Disposal to Land (August 2018)."</u></b></p>	<p><b>Oppose</b></p>	<p><i>The new policy does not take into account that a landfill can be designated under a district plan, as it has been in this instance, and therefore the presence of a landfill is anticipated. Nor does this policy acknowledge that potential effects on neighbouring properties can be mitigated through appropriate management practices. BSFL's submission is also inconsistent with DCC's own submission seeking the proposed Smooth Hill landfill be recognised as regionally significant infrastructure.</i></p>	<p><b>DCC seeks that this part of the submission be disallowed</b></p>

	<p><i>Amendment to policy 7.4.11 ... v. Methods to protect local amenity values; and</i>  <i>vi. Methods to avoid adverse effects on surrounding land uses.</i></p>	<p><b>Oppose</b></p>	<p><i>Policy 7,4,111 is about minimising adverse effects and "protection" of local amenity values and "avoiding" adverse effects on surrounding land uses would not seem consistent with this. The submission does not acknowledge that potential effects can be mitigated through appropriate management practices.</i></p>	<p><i>DCC seeks that this part of the submission be disallowed.</i></p>
	<p><i>Amendment to assessment matters 7.6.1.2 proposed by BSFL</i>  <i>"(k) Whether a proposed landfill is appropriately located to avoid establishment near existing land uses that are sensitive to the effects of the landfill;</i>  <i>(l) Local amenity values."</i></p>	<p><b>Oppose</b></p>	<p><i>Potential effects can be mitigated through appropriate management practices and it is not necessary to "avoid" locating in order to manage effects.</i></p>	<p><i>DCC seeks that this part of the submission be disallowed.</i></p>
	<p><i>New rule 7.6.1.X (which BSFL seeks to be included) "<u>Any new landfill within 2 km of any residential dwelling is a non-complying activity</u>"</i></p>	<p><b>Oppose</b></p>	<p><i>This proposed rule ignores the fact that the proposed Smooth Hill landfill is zoned Coastal Rural under the Dunedin 2GP and permits activities including farming and forestry, as well as discharges which are permitted under the Regional Plan, which can have potential effects. The site has been designated for a landfill since the 1990s. BSFL's submission is also inconsistent with DCC's own submission</i></p>	<p><i>DCC seeks that this part of the submission be disallowed.</i></p>

			<i>seeking the proposed Smooth Hill landfill be recognised as regionally significant infrastructure.</i>	
<b>Dunedin International Airport Limited (DIAL)</b>	<b><i>New policy 7.4.11A (which DIAL seeks to be included) "<u>Avoid the effects of landfills on airports</u>"</i></b>	<b><i>Oppose</i></b>	<b><i>Potential effects can be mitigated through appropriate management practices and it is not necessary to "avoid" locating in order to manage effects.</i></b>	<b><i>DCC seeks that this part of the submission be disallowed.</i></b>
	<b><i>Amendment to policy 7.4.11 (v) <u>Methods to ensure compatibility with surrounding land uses.</u></i></b>	<b><i>Oppose</i></b>	<b><i>The DCC considers that minimising potential effects is more appropriate than measuring "compatibility" and this is already in the wording of 7.4.11.</i></b>	<b><i>DCC seeks that this part of the submission be disallowed.</i></b>
	<b><i>Amendment to assessment matter 7.6.1 <u>k) The landfill is appropriately located to avoid adverse effects on airports;</u></i></b>	<b><i>Oppose</i></b>	<b><i>Potential effects can be mitigated through appropriate management practices and it is not necessary to "avoid" locating in order to manage effects. DIAL's submission is also inconsistent with DCC's own submission seeking the proposed Smooth Hill landfill be recognised as regionally significant infrastructure.</i></b>	<b><i>DCC seeks that this part of the submission be disallowed.</i></b>
	<b><i>New Rule 7.6.1.X (which DIAL seeks to be included) "<u>Any new landfill within 13km of an airport will be a non-complying activity</u>"</i></b>	<b><i>Oppose</i></b>	<b><i>Any potential effects on the airport will be considered as appropriate. It should not be a non-complying activity. DIAL's submission is also inconsistent with DCC's own submission seeking the proposed Smooth Hill landfill be recognised as</i></b>	<b><i>DCC seeks that this part of the submission be disallowed</i></b>

			<i>regionally significant infrastructure.</i>	
<i>Royal Forest and Bird Protection Society of New Zealand Inc</i>	<i>Amendment to policy 7.4.11 "To <u>avoid significant adverse effects</u> and minimise the adverse effects of discharges from new and operating landfills by requiring that ...</i>	<i>Oppose</i>	<i>It is more appropriate to retain the original wording of "minimising" adverse effects.</i>	<i>DCC seeks that this part of the submission be disallowed</i>

## Part E: Signature

Signature of person making further submission or person authorised to sign on behalf of person making further submission. Please note a signature is not required for electronic submissions.

Signature  Aaron Hawkins, Mayor of Dunedin

Date: 1 October 2020