

**BEFORE THE COMMISSION
APPOINTED BY THE OTAGO REGIONAL COUNCIL**

UNDER the Resource Management
Act 1991 (RMA)

IN THE MATTER Of an application by Dunedin
City Council for resource
consent being processed with
reference RM20.280

BY **SOUTH COAST
NEIGHBOURHOOD
SOCIETY AND
DAVID JOHN GRANT**

Submitters

STATEMENT OF EVIDENCE OF DAVID GRANT

DATED 6 MAY 2022



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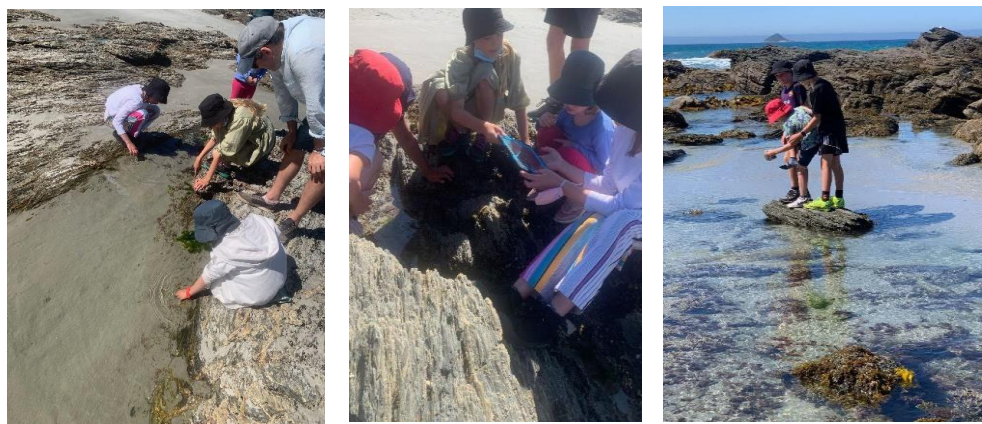
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STATEMENT OF EVIDENCE OF DAVID GRANT

Introduction

1. My name is David John Grant, and I am the principal of Big Rock Primary School, 2 Bath Street, Brighton, Dunedin and a resident of 11 Teignmouth Street, Abbotsford, Dunedin.
2. I filed a submission in relation to the Smooth Hill Landfill application.
3. The purpose of this evidence is to explain how the school uses Brighton Beach, Ōtokia Creek and surrounding areas as part of our education programme and how the area is used for leisure activities for families from not only Brighton/Ocean View but also the wider Dunedin area.
4. In this evidence I will set out and explain:
 - (a) The potential for the landfill to effect education programmes at our school and other schools
 - (b) The wider implications on leisure activities of the wider Dunedin community
 - (c) The perception of the proposed landfill for future generations

Education Programmes



Children learning at Brighton Beach. science integration with Education Outside the Classroom. Part of our Learning About, For and In the Environment

5. Our philosophy of Learning About, In and For the Environment uses Brighton Beach, Ōtokia Creek and the surrounding areas to deliver hands on learning about environmental issues. This is achieved through activities like planting in local swamp lands, investigating habitats and species that occupy these areas and instils an ethos of stewardship in the children to look after the Beach, Creek and Marsh.
6. The children also use Brighton Beach for surfing lessons, kayaking, open water swimming and water safety.



Big Rock children surfing at Brighton Beach, as part of our Over, On, In and Under Aquatics programme.

7. Our children are enthusiastic about their environment and caring for it. If they know that there is a landfill above, with the potential to contaminate their environment their relationship with their environment will be adversely affected.
8. Children have talked about the landfill in class since it first arose 18 months ago. Children have talked about it in recent discussions in topic work based on the sea and our local environment. Children are genuinely scared and dismayed at what this could do to their beach, to Dunedin's loved beach.

9. These conversations indicate that if the landfill goes ahead the children may be scared to use the beach or surrounding areas because of the risk of water contamination. The perception of this risk should not be underestimated. We have learnt from Covid, that perception of illness or death is very strong in children and causes immense anxiety. Covid anxiety is huge in children. In my experience, so is the fear of contaminated water.



The Beach and Creek are used as an Outdoor Classroom for Students so as to bring their learning genuine relevance but also to celebrate their amazing local environment

10. Parents are also less likely to encourage and support water safety programmes if they believe that the children have the potential to become sick or worse. This has the potential to affect health, wellbeing and longer term the Children's ability to engage in water sports safely later in life. We know New Zealand has an appalling drowning rate. Part of our Aquatics programme is about enjoying the NZ coastline safely. We are acutely aware of this as a beach community.



Big Rock children actively volunteering their time for planting in the Ōtokia Wetlands

Leisure Activities for the Wider Dunedin Community

11. As a child in Dunedin (Brockville) in the 1970s and 1980s, Brighton Beach was Dunedin's summer playground. The beach was pleasantly crowded, and the domain would have 2 circles of cars, an outer ring and a smaller ring in the middle.
12. This hasn't really changed. Brighton Beach is crowded on sunny days all summer long. It is a great beach for families, with the incredible support of Brighton Surf Lifesaving Club's volunteer lifeguards, it is safe, there is plenty of room for families and plenty of parking. A wonderful natural resource for the city.
13. In many ways, Brighton remains Dunedin's playground, a great beach within 15-20 minutes of the city. Families come to Brighton for picnics, to play in the sea, boogie board, and experience Dunedin's unparalleled access to the coast in a safe way.
14. Would those same families that have enjoyed for years, even decades, continue to picnic and play at Brighton if there was even the tiniest chance that the water and beach had become contaminated from the landfill? Would you? I know that I would struggle to expose my

family to that type of risk. Comments from families and children at the school suggest that feeling is widespread.

Risk and Perception of Risk of the Proposed Landfill

15. Brighton Beach is a much loved and enjoyed coastal outdoor recreational area. The landfill carries risk of contaminant escape into this precious environment. What happens if it does?
16. The answer to that question is the crux of my concern as School Principal. If this environment is contaminated, will it potentially be unusable?
17. The proposed landfill maybe at Smooth Hill but if contaminants escape, and Mr Rumsby's evidence is that the liner will over time fail, contaminants will run down through the connected wetlands to Brighton Beach.
18. No methods are proposed to return the Beach, Creek or Marsh to its current state if there is contamination and I don't know if such a thing would be possible. Once contaminants escape, there is no going back, short of moving the deposited waste to another more suitable location which begs the question why put it at Smooth Hill in the first place?
19. Instead of being associated with treasured memories and environmental values Brighton Beach will come to signify ill-health, poor ecology, and a collective failure to protect yet another unique environment from our waste.
20. People are not going to choose to go to Brighton Beach when it evokes health concerns coupled with the environmental shame of 'more of the same' send-it-to-landfill waste management.

Conclusion

21. The Landfill going ahead would have ongoing detrimental effects on:
 - (a) Education programmes for local children, now and in the future with both contamination and the perception of contamination

- (b) Creating a culture of caring for the environment will be more difficult to foster if the children see that their civic leaders are doing the opposite.
 - (c) Education programmes for children from the wider area with the same or similar concerns
 - (d) Water safety programmes not being able to be implemented at the children's local beach because of contamination risk and anxieties created by that risk.
 - (e) The wider community being unable to use this resource.
22. In my view there is a more compelling and optimistic story we can tell our children – one where we decided not to take the easy road, to place our environment ahead of human convenience and opt for a more urgent, and I accept potentially challenging path to Zero Waste. I can imagine our students being motivated by this and finding many ways of engaging them in learning about how to address the issue of waste minimisation within our community.
23. For these reasons, the application for consent should be declined in its entirety.

David Grant

Principal

Big Rock Primary School

6 May 2022