

To: The Chief Executive
Environment Southland
Private Bag 90116
DX20175
Invercargill

SUBMISSION FORM

Submission on a Notified Application for a Resource Consent

I: Southland District Council (Name(s))
of: 15 Fork Street Invercargill (Address)
at: 0800 732 732 (Phone) (Fax) Ian.marshall@southlandc.govt.nz (E-mail)

Wish to SUPPORT / OPPOSE / submit a NEUTRAL submission on (circle one) the application of:

Name: Kerr Inverurie Trust

And/or Organisation:

Application Number: 20171612 Location: Parawa

My reasons for my submission are: (State the nature of your submission and give clear reasons. Continue on attached pages if necessary)

see attached.

I wish the Council to make the following decision *(Give precise details, including the nature of any conditions sought)*

potentially grant if the attached concerns are subsequently managed.

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 heard in support of my submission.

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

I have served a copy of my submission on the applicant.

Yes No

Signed

pp. Mery (Charles Roy)
please contact Ian Marshall

Date

20/3/18

If you have any queries about this form or its purpose please contact the Consents Division of Environment Southland (03) 211 5115 or 0800 76 88 45.

The Southland District Council (Council) considers it is an affected party to this application under the RMA as it has constructed and continues to manage the Around the Mountains Cycle Trail (AMCT). The AMCT is a public easement bisecting the property to which this application relates (an indicative map of the AMCT location is outlined below).

Council's interests in this application relate to protecting the visitor experience associated with domestic and international tourists utilising the AMCT for walking and cycling and ensuring that as a product continues evolving into a regional and national attraction. Currently the AMCT has variable use, in certain sections during peak times it can have over 100 visitors per day. Unfortunately Council currently does not have accurate track count data for this location which can be used in this consenting process. However, this part of the trail is the linkage between the Oreti Valley and the Mataura Valley and visitor numbers are anticipated to grow over the proposed life of this application.

In reading the application with a mind-set of protecting visitor experience, Council has some uncertainty as to the extent of the odour effect which is likely to occur on the AMCT. Page 27/144 in the pdf. On the website indicates that there will be a "discharge of stormwater and compost" and "compost discharge" adjoining the AMCT. No discharge setbacks from the trail have been volunteered in the application which is visible on the map. Council is concerned that in its current state the application will have adverse effects (odour and leachate) that are more than minor on the AMCT which could be caused from the proposed discharges to air and land. Council notes and agrees with the application when it states that the prevailing wind direction is SW. Council considers that the prevailing wind direction will likely cause adverse odour effects on the AMCT irrespective of the setbacks and requests that the applicant advise how they will avoid, remedy and mitigate these effects.

The applicant's assessment under Section 5 of the RMA indicates that the activity "will have no more than minor adverse effects" Council considers the applicant has arrived at this conclusion without sufficient assessment of the amenity effects on the AMCT (particularly odour). Further, the applicant has not provided any justification as to how the application will have particular regard to Section 7, eg requiring the maintenance and enhancement of amenity values (c) and the maintenance and enhancement of the quality of the environment (f).

In this instance Council's submission is neutral until such time it has sufficient information to be entirely informed as to the extent of adverse effects (specifically odour and leachate) on the AMCT. If no further information is provided on the above Council may choose to oppose the application in its entirety.

Approximate AMCT location (in red)

