

To: The Chief Executive
Environment
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SUBMISSION FORM

Submission on a Notified Application for a Resource Consent

I: David John & Lynn Morae Gray (Name(s))
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Wish to ~~SUPPORT~~ / **OPPOSE** / submit a ~~NEUTRAL~~ submission on (circle one) the application of:

Name: Gore District Council
And/or Organisation: _____
Application Number: APP-20202268 Location: The intersection between Church and Huron Streets, on the east bank and Surrey Street on the west bank

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

See attached submission

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

We seek that the application be declined.

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



Date

16.09.20

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.

Note: The applicant has also applied to Gore District Council for resource consents in respect to this proposal. Submissions on the application made to Gore District Council must be made to the Gore District Council. Further information is available from the Gore District Council web site lets.talk.goredc.govt.nz. Submissions on all aspects of the application will be heard together as part of a joint hearing process involving Commissioners independent of the Gore District Council.

To: The Chief Executives
Gore District Council and Environment Southland

16 September 2020

Application to Environment Southland and the Gore District Council for the Proposed Longford Bridge.

Application Location: The Intersection between Church and Huron Street on the East Bank and Surrey Street on the West Bank

This is a submission on an application for resource consent from **Gore District Council** (LU2020/012 and Environment Southland APP-20202268) to construct a footbridge for the purposes of cycle and pedestrian transport and conveyance of municipal water supply with associated earthworks and landscaping. The proposed development is commonly referred to as the Longford Bridge and Pathway.

Submitters and address for service of documents:

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We are directly affected by the proposed activity. We are not a trade competitor of the applicant for the purposes of Section 308B of the Resource Management Act 1991 (**Act**).

We **oppose** the application in its entirety.

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| 1. General Concerns |
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(a) Need for the bridge

From our reading of the consent documentation, there is no inherent need for the bridge in this location and an argument has been crafted around the bridge (as a mechanism to carry infrastructure) rather than a merits-based assessment. There has been a failure to adequately consider the actual and potential effects of the proposal; the effects on us and our property are significant.

Those resource consents sought in relation to the proposed bridge are sought in isolation to the wider Longford Shared Path. The location of the wider shared pathway network has not been identified and therefore has not been assessed in terms of connectivity, appropriateness, and safety for its intended users. Subsequently, this casts doubt on the appropriateness of the proposed bridge location which terminates in an industrial zone frequented by heavy vehicles with poor visibility at both the entry and exit points.

(b) Alternatives

The consideration of alternatives is tokenism at best and the full extent of the activity has not been considered.

The present proposal represents only part of a larger pedestrian and cycling network that has not been evaluated and will likely result in significant adverse effects that may deem the bridge undesirable and therefore disused by the targeted user groups.

The assessment of alternatives provided in the application is not exhaustive and lacks appropriate detail as to why some locations, bridge design or water conveyance options were discounted.

(c) Consultation

The Ministry for the Environment have produced a document “*An everyday guide: Consultation for resource consent applicants*”. Within the document it states the following:

Consultation principles

A number of principles that help define the meaning of good consultation have emerged from case law under the RMA:

- **Early** – consult as soon as possible when the details of your proposal are less ‘set in concrete’ and you have more flexibility to make changes to address issues raised by interested and affected persons.
- **Transparent** – be open about what you want to achieve, what scope you may have to change certain aspects of your proposal, and why there might be elements that you may not be able to change.
- **Open mind** – keep your views open to people’s responses and to the benefits that might arise from consultation.
- **Two-way process** – consultation is intended as an exchange of information and requires both you and those consulted to put forward their points of view, and to listen to and consider other perspectives.
- **Not a means to an end** – while consultation is not an open-ended, never-ending process, it should not be seen merely as an item on a list of things to do that should be crossed off as soon as possible.
- **Ongoing** – it may be that consultation, or at least ongoing communication, will continue after your application has been lodged or even after a decision has been made.
- **Agreement not necessary** – consultation does not mean that all parties have to agree to a proposal, although it is expected that all parties will make a genuine effort. While agreement may not be reached on all issues, points of difference will become clearer or more specific.

Clause 6(1) (f) of Schedule 4 of the Act requires the identification of, and any consultation with, persons affected by the activity.

There were no attempts at consultation until two years after the project was approved for advancement by the Gore District Council. The application states that work is to commence in September 2020 and the action taken to date clearly indicates that the applicant has treated this process as a box-ticking exercise, a *fait accompli*.

On 12 June 2020 a letter was placed in the mailboxes of residents in selected streets in East Gore (a copy of the letter is attached. (Attachment “A”) inviting them to a meeting at the East Gore Church Hall on Monday 15 June 2020. Effectively the residents of Huron Street and surrounding streets had only three days’ notice of this meeting. Nowhere in the letter did it mention a bridge, it talked about the water issue which all local residents, including ourselves, would like to see addressed. Two affected parties were met with separately earlier in the day of 15 June 2020 (us and a neighbour). We were not consulted with but merely shown a brochure of what the new bridge would look like. The brochure never mentioned the words “Proposed” new bridge or “Consultation” at any point leading many people to believe it was too late to have any input in the process.

The application document was only made available to the immediate neighbours at the time of resource consent lodgement, and even then, the Gore District Council would not directly release this document while they argued for the application to be processed without public notification.

The application incorrectly records what (little) consultation has been undertaken with directly affected parties. No attempt has been made to seek written approval from affected parties or to discuss the proposal in any meaningful way.

We have tried to consult ourselves but after an initial delay with arranging a meeting with Landpro we tried to coordinate another meeting but were told we needed to wait until the Resource Consent

application had been lodged (a copy of the email from Landpro is attached, Attachment "B") and then they would meet with us. Consultation after an application has been lodged is tokenism and generally pointless.

2. Landscape, Visual and Amenity Effects

(a) Effects on an Outstanding Natural Landscape and Feature

The landscape assessment has downplayed the significance of the landscape in which the application site is located and gives in adequate consideration to the fact that it is within an Outstanding Natural Landscape (ONL) and the Matura River and its margins are an Outstanding Natural Feature (ONF).

On a wider scale, the proposed bridge is completely discordant with the ONL of the Waimea Plains and Hokonui Hills. Views from our property to these landscape features are obstructed and significantly impacted.

No consideration has been given in the landscape assessment provided with the application to the objectives and policies in the Gore District Plan. It also neglects to assess the effects of lighting on landscape and visual amenity, and those impacts from our property and the surrounds.

Where the landscape assessment considers View Point 3 (at the corner of River Terrace and Huron Street), we agree with the following conclusions of that report:

- the character of outlook at this location for residences is predominantly rural, including Croydon Bush which flanks the Hokonui Hills.
- the bridge will be "highly visible".
- the bridge will "breach the skyline at this location where the forms of the landscape are currently dominated by a more naturalistic pattern".
- "the scale of the bridge structure when viewed from this point ensures that it is the dominant feature in the landscape".

The application landscape assessment concludes that the adverse effect of the bridge from this view point is rated in their own assessment as "high"; this is defined in the seven point scale adopted in the report as a "major change to the character of key attributes of the receiving environment and/or visual context within which it is seen; and or a major effect on the perceived amenity derived from it".

The visibility of the bridge is illustrated below as taken from Figure 13 the report.



Figure 13: Viewpoint 3 - The viewpoint from the corner of River Terrace and Huron Street post development.

The figure below is an image taken from inside of our house looking towards the bridge location.



(b) Visual effects on 36 Huron Street

The view over the Mataura River, up the Waimea Plains and on to the Mountains is a special view. That is the reason we purchased the property and built a house on it designed to take this view in and to enjoy it every day. The significance of this decision is very important because we did not purchase and build in the so called “best” area of Gore. Where we chose to build and live is the property we consider with the best water view in Gore as it takes in the river, Waimea Plains and the Mountains. There are no buildings or lights of any consequence in the view.

Any bridge at the location of Option 1 or 2 is completely out of character with that landscape and would obviously violate the ONL as recognised in the Gore District Plan.

The existence of any bridge at Option 1 or 2 will have a very high visual impact on 36 Huron Street. To that extent we disagree with the Visual Assessment Report which recorded the visual impact as merely “high”. A bridge will obliterate our view of the River, Walnut Grove, the Waimea Plains and the Mountains. It will in effect devastate our view and the very reason for us living at 36 Huron Street. Therefore, a bridge at Option 1 or 2 will have an adverse effect on us, and the significance of the adverse effect is very significant.

In addition, the construction of a bank access way to enable access to the bridge on the western side of the bridge will also be of significant adverse effect. This is because it will need to rise at approximately 9 degrees to reach a height of 4.5m – 5m high to meet the western end of the bridge and meet access requirements. Of necessity then, there will have to be a long bank which gets progressively higher.

This rising access way will essentially form a “wall” when viewed from River Terrace looking upstream of the Mataura River. This will become part of the skyline from River Terrace and will block the view of the Waimea Plains from River Terrace. This is another area which has not been addressed in the Visual Impact Report, and this aspect also needs to be addressed due to the adverse visual impact on all people using River Terrace. We also consider this to be an adverse effect of great significance.

In addition the access way will obviously be viewed from 36 Huron Street, and it will interfere with the views of the Waimea Plains and the Mountains from numerous parts of our property. We also challenge the veracity of the visual sketches contained in that report as not being representative of

the proposed bridge. Those sketches minimise the bulk and scale of the proposed bridge, and do not address the impact on the view from our property and the river terrace.

The bridge and the access way will create a visual barrier which prevents us viewing the Waimea Plains and the Mountains from 36 Huron Street, as well as from River Terrace and other properties on Huron Street.

The tower will cast a shadow on our property, particularly in winter.

Clearly the Visual Impact Assessment Report is deficient in respect to the perspectives from our property and surrounds.

(c) Effects on amenity values

The bridge will detract from the amenity value of the area and from our property. The bulk and scale of the access way and the bridge will dominate the location, and it will interfere with the ONF and wider ONL. There will be obvious adverse visual effects on the property owners close to the bridge, but also those property owners all over East Gore, and those parts of Gore west and east of Hokonui Drive, North Gore, and those entering Gore from the direction of Mandeville.

The people who enjoy walking alongside the River and taking in the view whilst eating their lunch, having a cuppa will no longer be able to enjoy the view because the bridge and access way will obstruct such a view, and cast a shadow over parts of that area. Fisherman will also be affected because the access on the western bank will be more difficult and there is the possibility that more people will be around which will detract from the fishing experience.

I fly fish at this point in the river; the scale and bulk of the access way and the bridge will destroy the fishing amenity value for me.

It is our view that a bridge will not be regularly used by pedestrians and or cyclists and therefore will not add to the amenity value of the area. Young children that cycle in this area are usually brought to it by their parents in vehicles and in fact don't cycle very far. On the other hand, "serious cyclists" would find a bridge only 650m from another bridge to be too short a distance to be of any great benefit to them. It is also my submission that very few children bike to school these days as they are either delivered by car or bussed across town. Therefore the number of people who will use the bridge often will be relatively few, and because of this, the amenity value of the area of the bridge in the context of cyclists and pedestrians will not be of significant benefit.

In addition to the above there is no evidence that there is an existing need for pedestrians or cyclists to use the bridge. There is no existing need for a link such as a link between different parts of a university, or workers or employees using the bridge as part of a commercial fitness operation. In other words there are no access problems which need to be "fixed" which could be alleviated by a new bridge. Therefore we strongly disagree with the application when it states that tourists, families and children will up take the link.

Our property is directly adjacent to the bridge and approach paths. Lighting will have a significant impact on night time amenity.

The Stantec report titled 'Longford Shared Path – Single Stage Business Case' describes the following lighting requirements to be incorporated into the bridge and path design:

"Lighting incorporated into the handrails of the main span, approach span and ramps and streetlighting on the approach paths." [54]

There is no current lighting plan for this bridge, yet from a safety aspect the 39 metres high pole would need to be lit for aviation flight paths, and for the safety of cyclists the pathways would need to be lit at night.

There is no artificial light emanating from the farmland and the introduction of any new artificial light associated with the bridge and/or the walkway amounts to an adverse effect, and its significance is such that light pollution will be introduced into the ONF.

Similarly, noise sources have not been detailed or assessed, inclusive of noise associated with wind in the cables, noise associated with people using the bridge and noise associated with water conveyance including the use of any pumps. There will also be a substantial loss of privacy due to increased pedestrian and cycle traffic. All of these matters will result in a significant loss of residential amenity that has not been given appropriate consideration in the application.

The proposal by GDC, if the project does proceed, to have machinery operating from 7.00am until 10.00pm at night is unacceptable in a residential area. The application states that noise will not exceed 55 decibels during the construction period, there is no report from an Acoustic Specialist to support this position. A lawnmower produces approximately 75 decibels. We consider it farcical the applicant thinks that heavy machinery and pile driving will be quieter than a lawn mower. There is also no traffic and construction management plan.

The sheer scale and dimensions of the bridge mean that we will lose all privacy in our home

(d) Statutory Considerations

The resource management context for outstanding natural landscapes is outlined in Part 2 of the Act as a matter of national importance. All persons exercising functions and powers under it shall recognise and provide for: (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development; and (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development.

Furthermore, the proposal has not given appropriate regard to those matters outlined under Section 7 of the Act which are as follows:

- (b) *the efficient use and development of natural and physical resources*
- (c) *the maintenance and enhancement of amenity values*
- (f) *maintenance and enhancement of the quality of the environment*
- (g) *any finite characteristics of natural and physical resources*

Section 6 (a) and (b) are implemented through Objective LNF.1 and Policy LNF.4 of the Southland Regional Policy Statement (RPS). Policy LNF.4 is replicated below:

“Local authorities shall protect outstanding natural features and landscapes from inappropriate subdivision, use and development by having regard to the following:

- (a) whether the adverse effects of inappropriate activities on outstanding natural features and landscapes are avoided;*
- (b) the extent to which the outstanding natural feature or landscape would be modified or damaged including duration, frequency, magnitude or scale of any effect;*
- (c) the irreversibility of adverse effects on outstanding natural features or landscape values;*
- (d) the resilience of the outstanding natural feature or landscape to change;*
- (e) opportunities to remedy or mitigate previous adverse effects on the outstanding natural feature or landscape;*
- (f) whether the activity will lead to cumulative adverse effects on the outstanding natural feature or landscape;*
- (g) the relationship of the landscape to the surrounding environment.”*

The surrounding landscape is highly sensitive to change with the present proposal introducing a significant and irreversible change to the immediate and wider landscape such that it is repugnant with the above policy.

Objective 2.2.3 and its associated policies of the Gore District Plan give effect to the objective and policy of the RPS referred to above. Notably, Chapter 2 of the GDP identifies the Mataura River as an ONF and the Hokonui Hills to the north-west as an ONL.

The proposal does not protect either ONF and ONL.

Policy 2.2.4 [2] outlines the need to avoid the erection of structures that project beyond the ridgelines of the Hokonui Hills when observed from areas, sites or land other than that which the structure is being built on. Policy 2.2.4 [3] similarly requires the need to avoid activities that could compromise the visual values of the Hokonui Hills.

The need to preserve the natural character of the margins of the Mataura River is recognised in Objective 2.4.3 [1]. The Longford Shared Path – Single Stage Business Case prepared by Stantec identifies that “280m of 3m wide hard surfaced shared path, across the west of the river, crossing the flood plain on the line of the existing Surrey Street and Richmond Street paper roads.” [54] is required. (we understand that Avon Street is still a consideration for the pathways, but this is another matter of uncertainty about the application). Whilst this has not been included in the Application, it is indicative of the level of built form that may be required to establish the Longford Shared Path and the potential impacts on the degree of naturalness of the Mataura River margins which has not been assessed.

Chapter 3 of the GDP relates to land use. Objective 3.3 [1] outlines the need to maintain and enhance the amenity values of the various localities within the District. Objective 3.3 [2] is more specific, seeking to ensure that the effects of land use activities do not adversely affect the quality of the environment and are “...compatible with the characteristics and amenity values of each locality.” Given the scale and design of the bridge, being the largest structure within the township, if erected, the bridge will be vastly inconsistent with the character and scale of built form within Gore and is incompatible with the rural and natural landscape in which it will be seen. It therefore stands that the proposal is contrary to these objectives. By virtue of being contrary to Objectives 3.3 [1] and 3.3 [2], the proposal cannot achieve Policy 3.4 [2].

The Gore District Council and Southland Regional Council both have a statutory obligation under Part 2 of the Act to recognise and protect this landscape from inappropriate use and development. As demonstrated in the quotes above, there has been no attempt to minimise the significant adverse visual effects of the proposed bridge, and conversely the application further states:

“The proposed bridge is a cable-stay design and will be the longest and tallest structure of this type in New Zealand at 39m high and 90m long.”

The design of the bridge is such that it is making some sort of statement in visual excess. There has been no attempt to mitigate the unacceptable adverse visual effects. The application offers landscape plantings at each end of the aberration and that the structure will be painted in (unspecified) visually recessive colours or that it will be patterned. These mitigation methods are mere tokenism and will not camouflage or minimise a visually dominant structure located within an ONF. Structurally there is no need for such a grandiose design, keeping in mind it is a pipe bridge with a cycleway on top.

The sheer scale of the abutments, the cable pylon and the bridge are an insult to the natural visual beauty and open feel of the area. There is no operational need for a bridge of this size and scale when a smaller, less expensive alternative can be built at Maitland Street or pipes can be laid under the bed of the river.

The Landscape Assessment states in Section 4.1

The landscape effects associated with the proposed bridge and associated peripheral structures in their current form are significant and will be difficult to avoid, remedy or mitigate.

3. Hazards and Safety

(a) Flood risk

The building of an abutment on the West Bank of the Mataura River creates an obstruction on a floodplain. This abutment will also affect the direction of the flow of floodwaters.

The increased potential for inundation by flooding due to work on the East flood bank for the construction of water pipes or any part of the bridge structure will create instability and weakness in the flood bank, potentially leading to a breach when the river is in flood.

Increased levels of gravel on the base of the riverbed north of the proposed bridge have increased the height and speed of the water at this point below the bend in the river. Because it is the narrowest part of the river, the velocity and higher level of water through this area during flooding has increased significantly, leading to concerns by locals of a higher risk of the bank breaching (it was noted by a local resident that the flood bank was “shuddering” in the February floods).

Irrespective of the proposed height of the new bridge, branches of trees coming down the river during floods could get ensnared in the cables of the bridge or the bridge itself. (Attachments “C”, “D” and “E” showing the river in flood during the February event).

The application shows that the bridge would be below the flood waters of a similar event to February 2020. The structure represents a hazard that is a significant risk to property and life.

(b) Erosion and Soil Loss

Since the February 2020 floods, erosion along the riverbanks near the proposed site of the bridge have been significant. The banks are no longer safe to walk along as they are collapsing more and more each week (Attachments “F” and “G”).

There have been a significant number of large floods over the last 50 to 60 years which have resulted in the farmland at Option 1 and 2 being inundated with flood water. This means that the bridge western accessway and support system will be subjected to fast moving flood water which will erode the support around the accessway and bridge support structure. It is impossible to state categorically whether the accessway and the bridge support structure would survive in such a flood event.

This is particularly important on the west bank because the access way and bridge support structure is right beside the western bank of the River. As the ground upon which the access way is to be built is essentially sediment, there is every likelihood that the erosion will continue, and the access way will then be placed in jeopardy. Should this happen, mostly likely in a large flood event, the failure could affect the flood waters and cause complications for the flood water moving past, and also imperil the bridge support structure. The only way to so protect the access way and the bridge support structure in these circumstances is to build protective structures down to the bedrock. This will of course be very expensive, and will have significant adverse visual effects; this is a likely consequence of this proposal that has not been considered.

On the eastern side of the River, the river bank potentially will also be “eaten” into, and ultimately will put the pipes dug into the flood bank at risk, if not the floodbanks themselves.

In addition the eastern flood banks are not of substantial construction, and in large floods have become very sodden. Fears of the flood banks collapse have been raised, and explosives have been placed on the flood bank just above the Option 1 and 2 site – (say 100m) from the bridge site to blow up the flood bank to prevent “down town” Gore from being flooded.

Such “blowing” of the flood bank is always a possibility, and if such an event did occur, then the bridge support structure in the eastern flood bank could be placed at risk. The explosion to breach

the flood bank (which will be a sodden flood bank) may well jeopardise the bridge, and the bridge may fail.

The Mataura River is an Alluvial River. It is well known that such rivers scour their beds. They are continually changing their position and shape as a consequence of the water forces generated in the river. The erosion indicated in photo # shows what we submit is lateral erosion of the western bank of the River, next to where the western access way will be located. This is the River changing its course and is putting the access way at risk. Any "protection" constructed to protect the access way will be subject to scouring by the River so to place the access way at risk of failure or subsidence undermining. Sufficient scouring will also put the bridge support structure at risk, and will remain a continuous issue.

A failure of the bridge support structure is a serious issue for us because we believe that in the event of a failure of the bridge it is possible for the wire cable stays to damage our property or indeed any person on our property.

The structures supporting the bridge on both the west and east side of the River on the floodplain are subject to potential failure which cannot be adequately remedied or engineered, and constitute a risk that should not be advanced.

In addition to the potential for the flood waters to weaken and possibly destroy the accessway, bridge support structure and the flood banks, the accessway and bridge support structure on the west bank could act as a collection point of flood debris such as logs which could grow bigger. Given that the "river flood channel" narrows significantly at this point, and the speed of the flood waters speed up, there is the potential for this debris raft to break away from the accessway and bridge support system and career downstream and into the SH1 Bridge and or Railway Bridge. There would be no time/distance to allow such a raft to break up. Such an event could seriously weaken those bridges, and potentially destroy them. This is not desirable and such a catastrophic outcome is best avoided by not placing a man-made obstruction in the river flood plain which could create such a risk. Indeed the Resource Management Act requires local authorities to avoid risk and err on the side of caution and we consider the application should be declined upon the abovementioned grounds.

The assessment of effects does not consider any potential effects of the bridge becoming destabilised or destroyed in the event of a flood on downstream properties and infrastructure. Whilst unlikely, such an assessment is required under the Act as the meaning of effect is inclusive of any potential effects of low probability which have a high potential impact¹. If the bridge becomes unsecure and detaches either partially or fully, it may have a significant impact on people, property and infrastructure.

Section 1.1 of the Application describes the total mast height as 39m whilst the proposed mitigation outlined in Section 5.13 seeks to authorise a mast height no greater than 40m. The Riley report labelled '*Geotechnical and Hydraulic Inputs Longford Shared Path, Gore*' have cited the mast height as being only 32m [p2]. The inconsistencies in understanding of what is being applied for casts doubt on the validity of assessments provided to date.

A bridge here constitutes an inappropriate hazard in a floodplain which should be avoided.

(c) Safety

The perception by New Zealand Transport Agency (NZTA) is that "the barrier to increased cycling in areas is that people are genuinely concerned about their safety". NZTA funded 55% of this project on the basis of "End to End Journeys" (in fact we believe it was a condition in their approval of funding that children and the disabled would be able to access the schools and CBD by safer means than travelling across the SH1 Bridge). The application fails to address the "End to End Journeys" and therefore fails to address accessway, approach ramp and the crossing of State Highway 94 and the heavy truck bypass.

As Gore District Council does not address pathways in this application, we have a bridge leading to nowhere. Nevertheless access onto the bridge from Huron Street/Church Street has a major issue

¹ Section 3(f) of the Resource Management Act 1991.

with visibility, (Attachment "H" showing a recent accident at the access point to the bridge) and in summer the increase in farm vehicles and milk trucks travelling over the floodbanks to Woolwich Street or along Huron Street wouldn't be conducive to small children or the disabled crossing the road to the bridge at these points.

The Gore District Council do not address the exit of the pathways as the children would still have to cross SH94 (which is the busy tourist route to Queenstown) and if they came out onto Surrey Street then SH94 they would be in the path of the fire station and the end of the truck bypass. If they choose an alternate route and the cycleway carries on under State Highway 1, these same children have to exit out onto the very same truck bypass that NZTA said was too dangerous to promote increased cycling for the young and disabled in the first place.

The inclines leading up to either side of the bridge are shown to be very steep but putting fences up to stop people cycling off the side of the slope means the fences cause another impediment to the flow of the river in times of flooding.

(d) Bird strike and aviation risk

The cable stay bridge is in direct line with the natural flight path of birds travelling down the Mataura River. Wires are reported to be especially lethal when they cross above rivers. In particular the most damage is done at night when the cable wires are not visible, but as GDC have not submitted a lighting plan we are unable to determine their intentions in regard to lighting. Wetland birds such as waders often migrate or travel at night and using the shine of rivers is one of their methods of navigation. Collisions with black-billed gulls and South Island pied oystercatchers would be of particular concern because of their declining status and their significant breeding populations in Southland.

It is also unknown what risk the structure presents to aviation and whether there needs to be additional lighting as a result of the height of the structure.

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| 4. Cultural Significance |
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(a) Failure to consult or consider cultural values

As a direct descendent of Kāti Māmoe and Waitaha and whose ancestors were seasonal travellers in the Murihiku region, the submitter gains a sense of identity and belonging to the area and a connection to the environment through the natural uninterrupted views from their property of the Hokonui Hills, Mataura River and the Waimea Plains.

If we had been approached as affected parties at the start of this process back in June 2018 the Gore District Council would have been made aware of the submitter's cultural connections to this area.

There is no Cultural Impact Assessment associated with the application. Perversely the application states:

Following consultation between the Council and Hokonui Rūnanga on this proposal, a cultural impact assessment (CIA) will be prepared to confirm the above assessment. The CIA will be made available upon completion.

The application presumptuously assumes the CIA will confirm the assessment made in the application. Gore District Council do not have the right to speak for the Tangata Whenua. The Hokonui Rūnanga is perfectly capable of forming its own opinions.

The lack of a Cultural Impact Assessment is a major omission in the application and as such the application is incomplete and fundamentally flawed. There has been no cultural foundation to inform the proposal.

As a token form of collaboration, the Applicant has offered the Hokonui Rūnanga the opportunity to pick a colour scheme and design pattern for the bridge. The approach taken to date is far from the collaborative decision making process required as a result of the Maitara River being a recognised Statutory Acknowledgement Area, disregards the Council's responsibilities under Sections 6 and 8 of the Act and is contrary to the objectives and policies of the relevant regional and district plans. Additionally, the opportunity to select a colour scheme and pattern on a structure that is considered entirely inappropriate in the first instance, does not recognise in any way the relationship of Tangata Whenua with the Maitara River and the values held therein.

The Maitara River is a statutory acknowledgment area with the appropriate rūnanga being Hokonui. As a direct descendent of Kati Mamoe and Waitaha, the submitter has significant concerns about the effect of the proposal on known cultural and archaeological sites and any potentially unknown archaeological sites that may be uncovered as part of the bridge construction process. If such sites are uncovered during construction, no opportunity to relocate the bridge will be available if consent is granted.

The bridge will likely also have significant impacts on the cultural values of the Maitara River and Hokonui Hills as held by Hokonui Runanga the full depth of which will only be known via a cultural impact assessment.

(b) Statutory Considerations

Section 6 of the Act requires that the following matters of national importance are recognised and provided for, inclusive of:

- (e) *the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga; and*
- (g) *the protection of protected customary rights:*

The proposal has not given appropriate regard to those matters outlined under Section 7 of the Act which are as follows:

- (a) *kaitiakitanga*
- (aa) *the ethic of stewardship*
- (b) *the efficient use and development of natural and physical resources*
- (c) *the maintenance and enhancement of amenity values*
- (f) *maintenance and enhancement of the quality of the environment*
- (g) *any finite characteristics of natural and physical resources*

The Applicant considers the principles of the Treaty of Waitangi/Te Tiriti ō Waitangi have been taken into account, but this is clearly not the case given the lack of consultation to date and inadequate assessment of cultural values. The Maitara River is a Statutory Acknowledgment Area and both the Regional and District Council must uphold their obligations under Section 8 and consequently Te Tiriti ō Waitangi/The Treaty of Waitangi.

Objectives TW.3 and TW.4 of the RPS require that Tangata Whenua spiritual values, customary resources and sites of cultural significance are recognised and provided for in relation to Decision making. The cultural and spiritual significance of the Maitara River is recognised in the planning framework through its status as a Statutory Acknowledgement Area. The River is a well known source of mahika kai for Tangata Whenua. There are also known sites of archaeological and cultural significance within 50m of the Application site. This is scarcely acknowledged in the application with few details as to how these values will continue to be provided for as a result of the development. The absence of any consultation with local Runaka prior to lodging the application is evidence that the Application has not had appropriate regard for Tangata Whenua as required by these Objectives.

| |
|----------------------------|
| 5. Heritage Effects |
|----------------------------|

The submitter also has significant concerns about the effect of the proposal on known cultural and archaeological sites (Heritage NZ are currently researching the age of this site) and any potentially

unknown archaeological sites that may be uncovered as part of the bridge construction process. If such sites are uncovered during construction, no opportunity to relocate the bridge will be available if consent is granted.

This is of direct importance under section 6 (f) – the protection of historic heritage from inappropriate subdivision, use, and development.

6. Traffic and Parking

No consideration has been given to the wider effects of the activity in terms of traffic and parking effects.

There will be an increased need for parking in the area, which will have a direct effect on visibility for cyclists and pedestrians accessing the bridge as well as causing parking issues for the local residents.

7. Use of Reserve Land

Rule 4.2.2 of the Gore District Plan has not sought to be triggered in relation to the use of reserve land for the purposes of the bridge; the bridge will partially occupy Part Block XXVI Town of Gore. In its current form, the application cannot satisfy this rule as no management plan has been prepared in relation to the bridge and therefore approval under the Reserves Act cannot be obtained from the Minister.

The proposal is likely to be inconsistent with the Reserves Management Act 1977.

8. Concluding Comments

The effects of the proposal are significant. Through the intent of the bridge design, the effects cannot be avoided, remedied or mitigated and no effect has been made to do so.

The proposal is at odds and repugnant to the objectives and policies of the District and Regional Plans, and the Southland Regional Policy Statement.

The proposal conflicts with Part 2 of the Act, in particular section 6, 7 and 8. The proposal cannot meet the purpose of the Act under section 5 and does not represent sustainable management.

9. Other

We wish to be heard in support of our submission.

We wish to be involved in any pre-hearing meeting that may be held for this application.

We have served a copy of our submission on the Applicant.

We seek that the application is **declined**.

Signed:

RURAL CITY LIVING



12 June 2020

29 Bowler Avenue, Gore 9710
PO Box 8, Gore 9740

• Phone 03 209 0330
Email info@goredc.govt.nz
www.goredc.govt.nz

Gore Water Treatment Plant Upgrade

Dear Resident

The Gore District Council is about to embark on a major project to upgrade its water treatment plant, in Wentworth Street.

I would like to invite you to a presentation about the project on Monday 15 June, at 5.30pm, in the East Gore Arts Centre.

This multi-faceted project involves centralizing water treatment for Gore at the East Gore treatment plant. This will involve the installation of a membrane filtration system and laying a new pipeline across the Mataura River.

When the project is finished, the Council will be able to ensure Gore residents have access to a quality water supply, which meets New Zealand Drinking Water Standards.

Councillors and staff will be available on Monday evening to talk about the project and aspects that may have a direct or indirect effect on you and your property.

I look forward to seeing you then.

Many thanks

A handwritten signature in black ink, appearing to be "Tracy Hicks".

Tracy Hicks JP
Gore District Mayor

A B Gray

From: Lynn Gray <lynn@lynngrayinteriors.co.nz>
Sent: Wednesday, 16 September 2020 10:34 a.m.
To: admin@abgraylaw.co.nz
Subject: Fwd: RE: Longford Bridge - Resource Consent byt Gore District Council

Emails to Claire re meetings for printing

----- Forwarded Message -----

Subject: RE: Longford Bridge - Resource Consent byt Gore District Council
Date: Fri, 14 Aug 2020 04:10:00 +0000
From: Claire Perkins <Claire@landpro.co.nz>
To: Lynn Gray <lynn@lynngrayinteriors.co.nz>, Hashem Ramezan-zadeh <HRamezan-zadeh@goredc.govt.nz>, Brett Giddens <brett@townplanning.co.nz>

Hi Lynn,

Apologies for the delayed reply. At this stage I will be unable to meet with you next week, however, there should be an opportunity to discuss the proposal with you more fully after notification, which should be occurring soon.

Regards,
Claire

Claire Perkins
Senior Planner / Team Leader
027 445 6897

-----Original Message-----

From: Lynn Gray <lynn@lynngrayinteriors.co.nz> Sent: Monday, 10 August 2020 10:15 PM
To: Claire Perkins <Claire@landpro.co.nz>; Hashem Ramezan-zadeh <HRamezan-zadeh@goredc.govt.nz>; Brett Giddens <brett@townplanning.co.nz>
Subject: Re: Longford Bridge - Resource Consent byt Gore District Council

Hi Claire,

Notwithstanding Hashems response (which is another example of the total lack of consultation undertaken to date by GDC in regard to this process) we are happy to meet with you on Monday but if possible 12.00pm would be more suitable

Kind regards

Lynn Gray

On 10/08/2020 2:35 pm, Claire Perkins wrote:

Hi Lynn

Yes I'd be happy to meet with you (and others) next week. Ideally around 11.30am on Monday 17th or Thursday 20th would suit if that works at your end?

We wouldn't be looking to present information to you but rather be there to listen to your thoughts and concerns, having now been able to read the application document and supporting reports, and help to clarify your understanding of the proposed bridge design and construction methods if necessary.

Please let me know if either of those days/times would work.

Regards.,
Claire

Claire Perkins
Senior Planner / Team Leader
027 445 6897

-----Original Message-----

From: Lynn Gray <lynn@lynngrayinteriors.co.nz>
Sent: Monday, 10 August 2020 1:37 PM
To: Claire Perkins <Claire@landpro.co.nz>
Subject: Re: Longford Bridge - Resource Consent byt Gore District Council

Hi Claire

Sorry it took so long to get back you. We have a formed a Society, "The Waimea Plains Landscape Protection Society Inc" and we are happy (along with other members) to meet with you to hear how you can be of help to us.

Will you be in Gore in the near future so we can set up a time and meeting place?

Kind regards

Lynn Gray

On 22/07/2020 11:52 am, Claire Perkins wrote:

Thank you Lynn. Look forward to hearing from you to discuss further.

Regards,
Claire

Claire Perkins
Senior Planner / Team Leader
027 445 6897

-----Original Message-----

From: Lynn Gray <lynn@lynngrayinteriors.co.nz>
Sent: Wednesday, 22 July 2020 9:36 AM
To: Claire Perkins <Claire@landpro.co.nz>
Subject: Longford Bridge - Resource Consent byt Gore District Council

Hi Claire

Thank you for your email dated 20 July 2020. We are awaiting a response from our Planning Consultant and once he has advised us on what needs to be done we will be back in contact.

Kind regards

Lynn and David Gray

A B Gray

From: Lynn Gray <lynn@lynngrayinteriors.co.nz>
Sent: Wednesday, 16 September 2020 10:37 a.m.
To: admin@abgraylaw.co.nz
Subject: Fwd: RE: Longford Bridge - Resource Consent by Gore District Council

~~Removes capacity meeting~~

----- Forwarded Message -----

Subject: RE: Longford Bridge - Resource Consent by Gore District Council
Date: Mon, 10 Aug 2020 04:40:48 +0000
From: Hashem Ramezan-zadeh <HRamezan-zadeh@goredc.govt.nz>
To: Claire Perkins <Claire@landpro.co.nz>, Lynn Gray <lynn@lynngrayinteriors.co.nz>

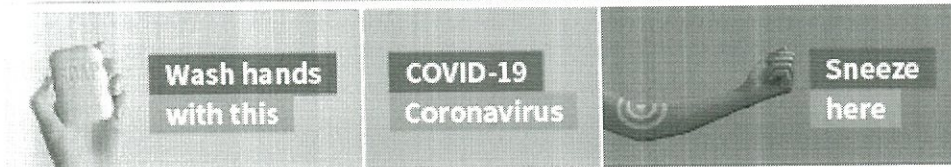
Hi Claire and Lynn,

Thanks for your attempts to organise a meeting. I think it is very late for such meeting which we could have before lodging the application.

Now, we have to stick to the resource consenting process. We definitely will have the opportunity to clarify any matter which needs discussion and clarification during the process.

Regards,
Hashem

Hashem Ramezan-zadeh | Project Manager Infrastructure
T: 03 209 0330 | **DDI:** 03 748 0102 | **M:** 021 195 7018
E: hramezan-zadeh@goredc.govt.nz | **W:** www.goredc.govt.nz
Gore District Council, 29 Bowler Avenue, PO Box 8, Gore, 9740



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-----Original Message-----

From: Claire Perkins [<mailto:Claire@landpro.co.nz>]
Sent: Monday, 10 August 2020 2:36 PM

"C"





"D"





"F"

Drill hole marks



erosion



erosion





"G"

"H"



Huron Street

Church Street