

Submission for the Longford Bridge & Pathway, Gore

Submission to resource consent application reference APP-20202268.

ES Consents Dept

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He iti, He pounamu

It may be small but it is very precious

Ko Oreti taku awa

Ko Takitimu taku maunga,

Ko Takitimu taku waka

Ko Ngaitahu taku iwi

Ko Te Rau Aroha taku marae

No Mossburn taku kainga

Ko Jenny Campbell ahau

Submission to Gore District Council (GDC)

Proposed Activity and Location: The Longford Bridge and Pathway

I am not a trade competitor.

I would consider presenting a joint case.,

I oppose the application on the following grounds and seek that it be declined in full, for the following reasons:

Bird Strike & Effects of lighting, flooding, cultural implications, consultation aspects, visual pollution, noise impacts, safety aspects, general.

It is essential that a full Environmental Impact Report is carried out. This is essential as required under the Resource Management Act (RMA).

This application is contrary to Part 11 RMA.

I do wish to be heard in respect of this Consent

Bird Strike & other impacts

The proposed design with high suspension wires (up to 39m) as part of the construction are considered an impediment to birds flight and in particular native migratory birds. I recommend that Gore DC undertakes a research project to establish this impact and establish flyways in this area.

Shags, ducks, gulls will be more affected rather than other natives eg Tui, Kereru locally.

Potential hazard to birds

Towers and wires are a well- recognised hazard to birds.
There is a substantial literature on bird strike by such structures.

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.

However there is no specific knowledge of bird activities and flyways in this area and little elsewhere in New Zealand.

Lighting along the wires might reduce the threat by making them more visible but the lights are also an attraction for insects around which the birds gather and circle to catch and eat. This makes the wires a very real threat to the birds especially at night. Consequently it would be easier not to have a tall suspension structure.

Other nearby structures and trees would also influence the level of hazard.

Some relevant Links

Bird Strike - general

Opportunities to Reduce Bird Collisions with Communications Towers While Reducing Tower Lighting Costs

<https://www.fws.gov/southeast/pdf/guidelines/reducing-bird-communication-tower-collisions.pdf>

<https://www.fcc.gov/guides/towers-and-birds>
<https://abcbirds.org/stop-bird-tower-collisions/>

Green Light for Nocturnally Migrating Birds

<http://www.ecologyandsociety.org/vol13/iss2/art47/>

The dark side of light: how artificial lighting is harming the natural world

<https://www.nature.com/articles/d41586-018-00665-7>

Fatal Light Awareness Program (FLAP) Canada

<https://flap.org/why-do-birds-hit-buildings/>

Effect of Lighting

I understand the proposed bridge will be lit at night as a 'tourist attraction'.

From a safety perspective for aviation flight paths, walkers and cyclists at night there needs to be a lighting plan.

Birds which migrate are disturbed by bright lights and can become confused and distracted from their normal flight paths, particularly migratory birds.

A 'Bird Strike Risk Assessment' needs to be carried out.

Some relevant Links

New Zealand Based

Te Tangi a Tauira - The Cry of the People.

Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008

This natural resource and environmental iwi management plan has been developed by Ngāi Tahu ki Murihiku.

There are references to Light pollution (search for "light") throughout this document:

<https://www.es.govt.nz/about-us/plans-and-strategies/regional-plans/iwi-management-plan>

Blue light Aotearoa How does blue light affect us?

A review of research on the impacts of the shift to blue rich lighting. LED lighting used in outdoor lighting is generally Blue Rich.

<https://www.royalsociety.org.nz/major-issues-and-projects/blue-light-aotearoa/>

Our Air 2018

Night skies and light pollution - pages 57 to 60.

This report can provide background or context for concerns around lighting of the bridge and approaches. "Air quality is the main focus of this report, but we have also provided information on

light pollution, noise pollution, and odours because they too can affect our quality of life."

<https://www.mfe.govt.nz/publications/environmental-reporting/our-air-2018>

<https://www.stats.govt.nz/indicators/artificial-night-sky-brightness>

Australian Based

National Light Pollution Guidelines for Wildlife

New Zealand shares lighting standards with Australia so this has relevance for NZ

<https://www.environment.gov.au/biodiversity/publications/national-light-pollution-guidelines-wildlife>

Freshwater

The influence of artificial light on stream and riparian ecosystems: questions, challenges, and perspectives

<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1890/ES11-00241.1>

Flooding

The risk of flooding with impacts on Gore township increases, due to the West Bank abutment on the Mataura River creating an obstruction on the floodplain and affects the flow of floodwaters. Construction on flood banks will create instability and so increase erosion potential. This is of real concern especially on the east bank when the river is in flood so increasing the risk of the breaching of flood banks, with resulting damage to all those living there.

Gravel has increased in the river bottom, so raising the bed and increasing speed of water at that bend in the river. At times of flooding this increases speed, volume and water height during flooding and so the increased risk of breaching flood banks. Debris in flood waters will be another hazard, caught up in the bridge structure.

The February 2020 floods show how the banks of the Mataura River are constantly being eroded and undercut and any concrete structures on those banks will only increase that danger.

Cultural Implications & consultation aspects

Te Tiriti o Waitangi obligations needed to have included local tangata whenua, Hokonui Rununga as key stakeholders from the beginning of this process. I understand this did not occur which breaches RMA rules and Tiriti ramifications. A full Cultural Impact Assessment must be undertaken.

A maori umu (earth oven) is present less than 50 metres from the proposed site of the bridge. The significance of this has now involved Heritage NZ, with an archaeological dig essential to establish its cultural value.

There needed to be full consultation with persons affected by the proposal eg neighbours, right from the beginning of the process. This is a requirement of Clause 6(1)(f) of Schedule 4 of the RMA.

Visual Landscape Pollution

The District Plan records the natural landscape of Waimea Plains, Hokonui Hills and Maitara River as 'Outstanding Natural Features'. The proposed bridge contravenes those natural landscape values, particularly the abutments and bridge structure.

Other alternatives need to be considered at a more southern point on the Maitara River, so reducing visual landscape pollution.

Noise Impacts

Wind in suspension wires, water pump noise, a place for people to gather as a social event so generating noise along with increased numbers of pedestrians and cyclists will all have impacts on residential neighbours and other people wanting to use the facilities in the area.

During the proposed construction period, having machinery operating in this residential area from 7.00am until 10.00pm is not acceptable.

Safety aspects.

Not enough work has been done on the safety for people with disabilities eg using wheelchairs as well as children and older people being able to access and leave the bridge in a safe way as pedestrians. The ways they can move on to or leave adjacent safe footpaths safely as they want to use or have used the bridge. There are different challenges for cyclists as they move from the proposed bridge and on the busy roads. Visibility for all pedestrian and cycling users and trucks and cars using adjacent roads needs a full assessment and evaluation so all are safe. NZTA and GDC need to do this and consult with likely users, affected parties and the general community in order to ascertain how access is appropriate and safe for all, both pedestrians and cyclists.

The steepness of the proposed access, to and from the proposed bridge, do not make them inclusive or safe for people in wheelchairs, people with different disabilities and children.

Parking is another aspect which needs to be provided for as people use the bridge for recreation and exercise, so not blocking local residents' access.

A full Safety Assessment must be undertaken in particular regarding the entry and exit points of the cycleway/ bridge to substantiate why NZTA approved a safer cycle /pathway than the current SH 1 bridge.

General.

Aspects of general care around the bridge such as ensuring facilities for disposing of rubbish to discourage litter and dumping in this public place. Items being dropped in to the river off the bridge will pollute the river and affect river life and habitat. Local people along with fishers from around the world come to fish here. Keeping the river in a pristine state is a priority especially for native species which are already endangered.

There will be on- going costs of maintenance to ratepayers which must be taken in to consideration when considering this project.

It is my view that a lot more work needs to be done around a lot of environmental, safety, consultation and other practical aspects before this project can proceed.

Nau te rourou, naku te rourou. ka ora te iwi.

From your food basket and my food basket there is sufficient for everyone.

Jenny Campbell

Member of Southland Forest & Bird Society

Acknowledgement and thanks to Steve Butler for background information around bird strike and lighting aspects.

Steve Butler

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