Environment Canterbury
Regional Council
Kaunihera Taiao ki Waitaha

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Submission on the Proposed Canterbury Air Regional Plan

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm, Friday 1 May 2015 to:

Freepost 1201
Proposed Canterbury Air Regional Plan.
Environment Canterbury
P O Box 345
Christchurch 8140

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Full Name: Victoria Anne Benton **Phone (Hm):** 021 882075

Organisation*: n.a. **Phone (Wk):** 021 882075

* the organisation that this submission is made on behalf of

Postal Address: 37 Liffey Fields Drive **Phone (Cell):**

Lincoln **Postcode:**

Email: Vbn328@gmail.com **Fax:**

Contact name and postal address for service of person making submission (if different from above):

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

a) adversely affects the environment; and
b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

☑ I could not gain an advantage in trade competition through this submission; or

☐ I could gain an advantage in trade competition through this submission. ***If you have ticked this box please select one of the following:***

- ☐ I am directly affected by an effect of the subject matter of the submission
- ☐ I am not directly affected by an effect of the subject matter of the submission

Signature: **Date:** 3 April 2015

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

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☑ I do not wish to be heard in support of my submission; or

☐ I do wish to be heard in support of my submission; and if so,

☐ I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

Page and Subsection	My submission and supporting reasons	I seek the following decisions from Environment Canterbury
Page 7-18 Subsection 7.57	I oppose subsection 7.57 for the following reasons: • Air pressure release valves can and do emit a strong and offensive odour which can cause odour nuisance to neighbouring properties. Affected parties should have the right to object and be heard through the resource consent process **OR** • Have the guaranteed assurance of a mandatory zero odour mitigation method with low visual impact on all air pressure release valves which discharge to air. • Hydrogen Sulphide is a highly flammable gas and has no place being pumped onto residential streets. • The wording around "not intended for residential use" in relation to public land in 7.57 is not clear and needs to be clearly defined as to its intention. • ~~Odour/Dust management plans do not offer full and clear protection to residents and affected parties. Case in point was the development of Barton Fields subdivision in Lincoln which caused severe dust problems for neighbouring properties. The dust caused health issues in several residents (asthma) and caused damage to properties. Ecan received many complaints over several months and conducted site visits but nothing was done to mitigate the dust by Ecan or the developer.~~	**Either** • All sewerage air pressure release valves discharging to air on publicly owned land should be a restricted discretionary activity requiring resource consent to the same level and conditions as AQL69 in the previous Canterbury Air Plan. **OR** • All sewerage air pressure release valves discharging to air must by law be fitted with a mitigation device (such as a "Green Dome" by Armatec Environmental) which ensures zero odour and low visual impact. Including all previously installed air pressure release valves discharging to air on publicly owned land, installed between 1 June 2002 – 27th February 2015 which were installed in breach of the RMA with no resource consent. Devices such as Green Dome also eliminate the hydrogen sulphide from the environment.

Page and Subsection	My submission and supporting reasons	I seek the following decisions from Environment Canterbury
PAGE 7-19 Subsection 7.58	I oppose subsection 7.58 for the following reasons:	All discharge to air from sewerage air release valves that do not meet the requirements of 7.57 should be restricted discretionary activities to the same level and conditions as AQL69 in the previous Canterbury Air Plan.
	• 7.58 will allow councils to install sewerage air pressure release valves on privately owned property.	
	• Home owners have the right to protect their homes and property.	
	• 7.58 takes away the property owners rights to object on location, devaluation of property values, visual impact, potential odour or any other issue.	
	• 7.58 is too biased in favour of councils and not the property owner.	
	• Discretion on 7.58 is limited to mitigation/remedy methods only and leaves no avenue for any affected parties to object on any other issue, which in effect makes the resource consent a foregone conclusion.