



Submission on the Proposed Canterbury Air Regional Plan

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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

A
 Full Name: Nicola Ann McQueen Phone (Hm): 03 325 7259
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 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: [Signature] Date: 29/04/2015
(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.

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Subsection 7.57

I oppose subsection 7.57 for the following reasons:

- 1) Air pressure release valves can and do emit a strong and offensive odour which can cause odour nuisance to neighbouring properties.
- 2) Affected parties should have the right to object to air pressure release valves due to odour nuisance and potential devaluation of their properties. 7.57 takes this right away.
- 3) If no resource consent is required for these valves then affected parties should be reassured of no adverse effects by means of a mitigation device which eliminates 100% of odour.
- 4) Hydrogen Sulphide is a highly flammable gas and has no place being pumped in large quantities into the urban environment by our councils.
- 5) The wording around "not ~~intended~~ intended for residential use" in relation to 7.57 is not clearly defined and requires further clarification.
- 6) There is no provision for relief of offensive or objectionable effects only dangerous or noxious, this is far too limiting and allows for public nuisance.



7) Air pressure release valves (sewer) can affect both the affected parties quality of life (i.e the right to the quiet & unpolluted enjoyment of their own property) and their property values. When allowing sewer air pressure release valves to be positioned on public land right on neighbouring property boundaries (as in Brookside Rd, Rolleston) the Councils have an obligation to protect neighboring properties from adverse effects such as odour. 7.57 allows Councils to disregard this obligation.

8) Odour management plans are only of use if they are able to be monitored and enforced when breached. The nature of Sewer Air Release Valves is that their worst effects occur in the early morning and evening hours when ECan Pollution Staff are not working and unable to follow up. Without ECan being able to substantiate any complaints, due to being outside office hours, nothing can be done to help the affected parties. This is the very instance we find ourselves in presently with the two valves positioned on our land. These valves are not allowed to be released to air on our land under the easement or the RMA & yet we have had 3 instances of the valves being released in the last few months. One was substantiated by a Siron Ferguson employee and SDC were formally warned (this happened at approx 7.20pm) but the other two incidences were not substantiated as they also occurred out of hours (7.20pm & 8.45am) & the Ecan pollution team were "too busy".

Daphne

(8 Continued)

What confidence can the public have in Odour plans and 7.57 when most if not all adverse effects will occur outside office hours and can not be substantiated by Environment Canterbury? It should also be pointed out that outside office hours is the very time that homeowners are at home trying to enjoy their families and homes.

Odour management plans in this instance will not and do not work.

9) Environment Canterbury has an obligation to it's ratepayers to protect their environment. Allowing offensive odours to be pumped into urban/populated areas without any mitigation to eliminate the odour is an abuse of that obligation.

I seek the following decisions from Environment Canterbury.

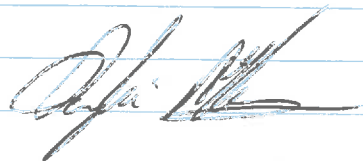
1) All sewerage air pressure release values discharging to air on publicly owned land should be a restricted discretionary activity requiring resource consent to the same level and conditions as AQL 69, including notification of affected parties.

OR

2) All sewerage air pressure release values discharging to air must by law be fitted with a mitigation device (such as

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a Green Dome by Arimatec Environmental) which ensures zero odour and low visual impact. This includes all air pressure release valves discharging to air installed in breach of the RMA without resource consent during the period 1st June 2002 - present day. Green Domes are used by many other Councils to mitigate odour from these valves, are cost effective and of low visual impact. They can also be fitted retrospectively. (Information provided by Green Dome makers Arimatec Environmental, I have no affiliation with this company other than having rung them for information)



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Subsection 7.58

I oppose subsection 7.58 for the following reasons-

1) 7.58 allows for the installation of sewer air pressure release valves that discharge to air on private land but limits the property owners rights to object to mitigation only. This is an outright breach of the property owners rights and is weighed heavily in favour of Councils.

2) I especially object to this rule (7.58) as I believe it is aimed directly at our property (21 Allendale Lane, Lincoln) as there are very few, if any other circumstances where this rule would be of use. We (my husband and I) also believe we should have been invited to participate in the Community Consultation Groups that reviewed the proposed changes in June 2014 as 7.58 directly affects us. In not including us in these consultations we believe Ecan have unfairly disadvantaged us. Environment Canterbury have been aware of our issues (at senior management levels) since February 2014 so there was no reason for us not to be included in the consultation process.

3) Home owners should have the right to protect their homes and property. 7.58 takes away this right.



I seek the following decisions from Environment Canterbury.

- 1) All discharge to air from sewerage air pressure release valves that do not meet the requirements of 7.57 remain restricted discretionary activities with the same rules and conditions as AQL 69, not limited to mitigation only
- 2) Full notification of these values to affected parties.
- 3) Private land is not included in 7.58 but ~~is~~ restricted to public land only

