

With Reference to

Applicant: **Canterbury Landscape Supplies Limited**
Address for service: Loe Pearce & Associates, Attn: Barry Loe, 100 Weston Road,
Christchurch 8052 or email: barryloe@xtra.co.nz

CRC 175 344

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From

Tom McBrearty 6 Redfern Lane RD6 Rangiora 7476

Opening Observations:

With Regard to the Resource Consent application at Diversion Road Swannanoa as per application notice.

Local effect to on pre-existing land owners, their families and educational institutions in the area

Composition of product clarification required.

These point will be expanded in the comments below opening observations

It should be noted that the majority of landowners in the area have occupied either lifestyle blocks or small to medium farms. In addition many landowners operate dual occupations/professions outside the region. All were pre-existing prior to the arrival of Canterbury Landscapes.

The region is not predominately dairy as stated in the application it is mixed farming operations, lifestyle block and farm support services.

The area is Eyreton not Swannanoa as stated in the application nor has it been part of the Eyrewell forest complex as stated in the application.

I am not anti-business. I am a concerned citizen who has not had any prior consultation in terms of the business operation. This was not expected due to locality however it had been a full notifiable consent from the beginning our community would be made aware and due process could have been followed. We have environmental concerns and note that at no stage has the company nor did its representatives approach Ngai Tahu regarding the likely effects on the land and water from their perspective. On that basis alone the claim on page 6 4.9 respecting the principle or the Treaty of Waitangi may well be more a case of ignoring the principles through lack of knowledge and lack of commitment.

It is noted that on the Resource application Page 7 item 5 it says "Consultation before lodging your application is one of the best ways of identifying adverse effects"

Surely that would mean consultation with residents on a broader geographic base?

It is noted that there has now been an application for a Land Transfer Station.

It is noted that this is a retrospective application. Resident believe that no consideration of the local people and their land operations as well as living quality shows a lack of empathy and understanding by CLS and its representatives.

It is noted that the site layout maps in the BECA report page 3 and the application page 3 vary in description.

It is noted that the description of organic materials on page 4 varies from the description of the mix at other CLS location 250 Main North Road. Does this “recipe” change have the adverse effect as noted by resident? And therefore does the leachate vary in terms of contamination?

It is noted that the description on Page 5 of the application state heights of windrows will be up to 3.5 metres yet the Appendix Management Plan (for CLS)states has a height of 4.5 metres with a length not exceeding 30-40 metres. In the Compost NZ Guide it is noted windrow heights range from 1.5 metre to 3 metres however the above notes from the Consent shows a far greater variation.

What effect does that have? What effects results from these operational differences?

Page 7 describes this as a waste management operation yet it also may be defined as a Waste Transfer System in operation. Therefore does that require a further Recourse Consent?

Page 7-CLS Tree bark is separated into sizes, stored and on sold. Does that mean the intention of CSL is to have a “Retail” operation on site? Even as a trade operation what does that mean in the operation of the activity?

Page 8 CSL No site of significance or sensitivity in terms of Ngai Tahu.

As CSL have not consulted with Ngai Tahu where is their “knowledge” coming from?

Page 8 Rainfall will soak into land CLS Quote. If so will it carry contaminates with it (see composition and soil types of the area)?

Page 10 Rule 7.6. CLS-Discharge does not cause or not likely to cause an adverse effect beyond the boundary of the property of origin.

Based on complaints over a wide regional range this is incorrect.

Page 12- Item 6. 6.1

Predominate use is Dairy. Pastoral Dairy Farming by Ngai Tahu is more than 15 KM away

This incorrect. The nearest neighbours are Horse Breeders, Vegetable growers and feedstock famers plus lifestyle blocks

Groundwater level

Page 18

Odour

On one had CLS state turning of compost occurs an average of 5 days per month when odour may occur

Does that concur with records of complaint? I have noted that the odour which is objectionable occurs intermittently and can be picked up as far away as Ohoka Downs Swannanoa and Mandeville

Page 19 Odours/Offensiveness The assertion here is that Human Receptors are not as sensitive to the odours as they are desensitised due to everyday odours in rural areas.

This repeating odour is so offensive and objectionable local receptors more commonly known as residents are certainly NOT desensitised

I oppose the operation as it stands based on concerns detailed below:

Air: Odour

Since the operations inception there has been a concern around air quality and airborne pollution via weather patterns. The Beca 17 August 2017) report used to show wind conditions are based on operational years 2008 -2011 and I suggest since the removal of the Eyrewell forest and atmospheric changes the winds are more persistent stronger and longer post 2013. This contribute to the odour problem at various time and as noted on the ECAN odour complaints line 0800 765 588.

The airborne odour is deemed by the closer neighbours as objectionable and these further out such as Mandeville, Ohoka Downs and Swannanoa it is deemed offensive.

It should be noted it was not until a Mandeville residents meeting on September the 20th the source of the odour had not been traced to the CLS site in Diversion Road. Since then the odour calls to ECAN have increased exponentially.

I and my family have been effected by the odour and to be honest initially had no idea where it (odour) was coming from until a recent Mandeville Residents meeting where the odour came up as a general interest comment at the end of the meeting.

NOTE

If the consent had gone through a pre-application public notice process we may not have to go through this exercise

Land

Location, geographic area, description and composition of land by CSL and its representatives conflicts with the “official descriptions” of the land and is more porous than stated.

There is a requirement I believe for greater and more robust soil and water testing in this location and surrounding areas.

Which leads us to concern about water.

Water:

Compacting of the land area slows the absorption of water however does not eliminate the potential for human and mechanical error during both the hours of operation and outside of hours of operation where there is an increasing risk of heavy rain events.

Residents local and further out have had flood event occur three times in 3 years. Two of these have been described as one in ten year events

The residents rely heavily on well water and many of these wells are relatively shallow. Most residents only have well water access for all of their home needs including drinking water.

The resident contend that the risk of pollution is higher with an operation such as CSL has placed in the vicinity of the homes and their farmland. Test to date may err on the positive side however this

may alter very rapidly and as a result contamination could occur rendering it impossible to use for stock water or human consumption.

Water for the residents is a vital necessity. They and I personally have a number of concerns and ask:

- What monitoring is in place in terms of well protection not just at the operational points?
- Where these would be located relevant to human consumption?
- If their well becomes contaminated who is responsible for cost of new well and or clean up?

Residents and I request that a 24 hour monitoring system is placed at suitable locations. This would be defined by the allocated experts of ECAN and WDC.

NOTE

I note that Eyre river water catchment runs in close proximity underneath the CSL location on to the Waimakariri and this in turn feeds West Melton water (Review of Eyre River CHCH West Melton Ground water allocation in R15/108). Does ECAN and WDC wish to expose the residents of Christchurch to further pollution risks as noted in a new broadcast on 17/10/17 on Radio NZ Morning Report Programme by Doctor Alastair Humphreys?

Fire

We contend that there is a greater fire risk on this site because of the close proximity to trees the high degree of the North West winds and its effect on the surrounding land to High Risk of fire from early summer through to autumn. This is particularly so on the areas that are not irrigated to the extent of a dairy farm operation.

The surrounding trees are of a similar age to those on the recent Port Hills fire and they Port Hills Trees) were seen to be highly inflammable during this tragic fire event.

We are not aware of the Fire Service making a submission however we request that they are consulted in terms of pollution, fire risk, access.

We understand that with the proximity to Transpower overhead towers and wires helicopters and fixed wing aircraft could not be activated in the event of a fire.

NOTE-Fire

In a fire in January 2015 at Budges Road Burnt Hill a two hectare site caught fire and took 12 hours and half a million litres of water to contain. The cause was a combination of spontaneous combustion, plus heat wind and organic material. The fire spread to nearby trees and grass.

The CLS site I contend is applying a perfect combination to repeat this event and the lack of 24 hour onsite monitoring is a very serious concern.

CSL have had 18 fire events at the original site on the main North Road.

If the consent is approved I request on behalf of the resident and myself personally that we have:

A management plan that should specify:

- the design and layout of water management systems on the site;
- measures to prevent feedstock contaminating stormwater;
- processes for preventing stormwater coming into contact with composting materials;

- methods for the capture and treatment and/or reuse of contaminated items
- stormwater and leachate;
- contingency measures;
- complaints procedures;
- monitoring of stormwater and/or leachate quality and quantity.

Land:

Water:

Fire:

Air

The above four bold points are the concerns I have however there are others such as

Health issues:

- physical & mental health of residents and the quality of life that has been comprised not just by the odour but also the fear of fire and contamination.
- Stress
- Concern about drinking water safety

General Effects on the Community

- Stress individually and collectively
- Lack of consultation with residents due to lack of public notice
- Worry about potential fire- a wide ranging concern
- The increase in flies-this is regional wide

Operating issues:

- Transport and trucking movements to and from
- The hours of work and traffic coming to site, diggers –people onsite at night in case emergencies particular should one arise out side of normal operating hours.
- Accurate monitoring of what comes onsite (unknown)
- Management of leachates (unknown)
- Feedstock selection putrescible organics management, storage (unknown)
- Potential to pollute water, air and land
- Trees will need to be harvested at 25-28 years (implications unknown)

- Complaints to date to ECan Pollution Hotline
- Application for 35 year lease is far too long a period without at least some reviews of operations every 4 years

Final observation:

Surely there must be a better way of applying rules to business operations than this retrospective process. Pharmacies, Retail operators and Hospitality have to “obey” the rules and follow process yet one that is so highly environmentally sensitive can be started in terms of operations and be in operation the apply for approval.

Frankly that is a flawed process.

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From

Tom McBrearty 6 Redfern Lane RD6 Rangiora 7476

Telephone 021 383 893

My name is Tom McBrearty.

I would like to begin by saying thank you for this opportunity to speak today.

In addition please feel free to stop me at any time to request clarification, or ask a question.

I have lived with my wife Yvonne and members of my family since 2012 following the loss of our home in Christchurch

We have had a longer association with the district through my parents (father) and siblings (sisters) two of whom still live in the district plus our sport of cycling in the areas since 1978.

Today I represent both the Mandeville Residents and myself as an individual.

The resident Association has had in excess 200 people at recent meetings regarding the CLS operation and other issues pertaining to operational hours, transport, odour and water.

I am a former CEO, Business partner, current director of McBrearty Ballantyne a business advisory company covering legacy and management issues.

Many of the people I represent today are business people, some are former farmers, and some are current farmers.

Bluntly we are not anti-business, nor are we anti progress.

We are aware however that for business to succeed in today's world it has to have location, process, raw product and finished product aligned with commitment to sustainability that protects the future well beyond the generation we live with and within. We are also aware adhering to the principles of business governance, regulatory authorities, commitment to health and safety and finally following the rules from day one makes the difference.

We are in favour of good business practice.

We are here today because there has been a systematic failure in process and development that offers a legacy risk that is intolerable.

It is our collective opinion that this operation has no place in the current location.

It is situated on land that is porous, close to water and in an area surrounded by small farms, lifestyle blocks.

Company operates under minimal standards.

They only change based on reactive principles

Wrong location wrong company

Placing not just locals at risk

Odour was entirely due to poor operational standards.

Odour resolution is temporary mitigation

Consent too long period 4 plus 4 plus 4 plus 4 checks and balances over a 16 year period operating at best practice nationally and internationally

Water at risk

Future at risk

Finally

This process has been flawed from the beginning

If there was NO opportunity start a business like this without a permit and retrospective consents applying this very expensive investment in time would have been prevented.

Both central and local governments have to close these loopholes of operational faults.

Tom McBrearty 021 383 893.