

From: [ECInfo](#)
To: [Mailroom Mailbox](#)
Subject: FW: Submission by Mace Properties for consent CRC194083 EMAIL:03620001240
Date: Wednesday, 29 January 2020 4:22:43 PM
Attachments: [Submission from Mace Properties regarding consent CRC194083.pdf](#)
Importance: High

Hello Team

This email came into our Customer Services email queue. Can you please workflow?

Kind regards

Laurel

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

From: Mace Michelle
Received: 29/01/2020 4:15 p.m.
To: Chilton Richard; Chilton Richard; ECInfo; Mailbox Customer Services
Subject: Submission by Mace Properties for consent CRC194083

To whom it may concern and R Chilton,
Please find attached submission from Mace Properties regarding the Resource Consent application by Waste Management

Regards

Michelle

Dr M. Mace

Mace Properties Ltd

Christchurch

New Zealand

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Director of Mace Properties Ltd which owns 16 Sir James Wattie Drive

Consent applicant Waste Management NZ Limited ("WMNZ")

CRC194083- to discharge contaminants into the air

29/01/2020

The directors of Mace Properties do not support the application. This plant should be situated away from houses and areas where a large number of people are working to the industry standard of 1000m set back from residential properties.

Reasons

1. Property in the area will be devalued due to having the Waste Management Plant close by. It will be difficult to tenant buildings due to odour issues and Tenants perceptions. It is unknown after years of testing as to whom the stench in Bromley is coming from and as such the possibility that it could be from the Waste management plant is high. Please see Stuff article link (<https://www.stuff.co.nz/environment/118951511/is-this-nzs-smelliest-suburb-tracking-down-the-source-of-bromleys-mysterious-stench>)
2. Note the Bromley neighbours are taking the drastic steps of moving away from the area due to the odour. Who is going to compensate us for the losses associated with our property values if this plant is consented and odours are greater than minor?
3. Our tenants' businesses will be affected by odour and dust as well. Their views should have been sought as part of this process.
4. There are no limits on the volumes of pesticides, herbicides, toxic waste and tyres that this plant is proposing to deal with.
5. There will be odour issues with the pesticides, herbicides etc that are not considered in this application. What are the down- stream contamination issues associated with any aerosols of these products for property owners that are close to this site? Personally I have worked with such chemicals for years and the odour associated with them is in my view not minor.
6. There are health issues associated with Herbicides, Pesticides and other toxic wastes and no detail how these risks will be managed? Ammonia, Chlorine, Hydrogen sulphide and sulphur dioxide are chemicals that will cause burning of airways in humans and animals. These chemicals when released into the atmosphere combine to produce chemicals that are corrosive to vehicles and buildings. How is this being mitigated?
7. How are they storing the medical wash solvents and cyanide waste and in what volumes? There is no risk mitigation detail present in this consent and what will happen if any of these compounds get discharged into the air?
8. There is a risk to water ways if an incident occurs with any of these processes or from particulates in the air which dissolve into the water. From what could be discharged in

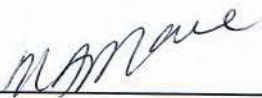
unknown quantities acidification of waterways may occur. This will have flow on effects for aquatic species.

9. The prevailing winds are likely to blow particulates a considerable distance from the plant and there is a school not far away and dust sensitive businesses operating.
10. We note that the East Tamaki Waste management plant successfully opposed the building of a pre-school within 800 m of their facility due to potential health risks to children. So, what about the people who live and work near the proposed plant they are considerably closer than 800m of this facility? What work has been done on the health risks to people of this proposed plant.
11. Odours from Septic tank effluent and other organic wastes are in my opinion likely to cause more than minor adverse effects to the surrounding area.
12. We have seen rubbish blowing from the existing site on Marshs Road which shouldn't be happening, but it has not been stopped. Is this going to be ignored at the new site too by Ecan? Rubbish could also blow on to the new motorway causing a hazard for drivers.
13. Tyre stockpiles are a fire risk and cause noxious fumes which require people to be evacuated. This is a risk to business continuity in this area and will further discourage tenants from leasing buildings in this area.
14. Mosquitos are also known to breed in stockpiled tyres and as such will be a contaminant discharged into the air. Currently there are no diseases spread by mosquitoes in New Zealand but the Ministry of Health (<https://www.health.govt.nz/news-media/media-releases/ministry-health-launches-new-campaign-fight-mosquito-borne-diseases>) believes it is only a matter of time until this occurs. With global warming the conditions for mosquitos carrying diseases such as Dengue fever will move further South. Please also see Landcare Research link as to effects on our native flora and fauna from mosquitos vectoring disease agents (<https://www.landcareresearch.co.nz/science/portfolios/defining-land-biota/invertebrates/invasive-invertebrates/mosquitoes/diseases>). What monitoring is going to occur with regard to mosquitoes as it would appear the applicant has not turned their mind to this issue? The consent is for 35 years by which time it is highly likely that these disease vectoring mosquitos will be in NZ
15. There is no detailed assessment of the tyre shredding and stockpiling on neighbouring businesses (or homes for that matter) - this work should have been undertaken before this consent was notified.
16. There is also an issue with the open-air nature of some of the processing on this site. This should all take place inside specially designed buildings which eliminate particulates
17. There is a lack of detail regarding the noise levels that could be emitted from this site
18. Ecan has been trying to find the source of odours around the Bromley plant for many years and has not found the source which leaves residents suffering. How can we have any faith that they will monitor and identify where odours are coming from in this new site?
19. This consent was only sent to Ngai Tahu which is a large organisation and sometimes in large companies things such as a consent notice like this get lost. How have you ensured that the relevant parties have been notified appropriately as waterways could end up being contaminated all the way to Lake Ellesmere?
20. The consents (Ecan and CCC) for this plant have been issued piecemeal. For transparency all should have been issued at the same time so that there was full understanding by affected parties of the issues surrounding this plant.
21. Dust in a howling Canterbury Nor wester is not going to be controlled by wetting down areas and what happens after hours when the wetting down stops?

22. Biofilters are notoriously complex and difficult to control. Changes in microbial levels in these filters can render them useless. There is no detail as to how this biofilter is going to be managed and maintained in full working order. What risk mitigation is in place if it does fail or are we all just subjected to odour until someone gets around to dealing with it? Also with all the noxious chemicals on site the biofilter could be damaged by contamination from another activity on site.
23. As this directly impacts on Selwyn District Council why weren't they consulted?
24. Currently there is odour from the site on Marshes Road when dump trucks are parked. What odour mitigation is going to occur for the range of trucks carrying different waste types when they arrive on site before they discharge their waste?
25. Building a plant like this and especially a consent for 35 years could allow Waste Management to not look at alternative treatment technologies to process this waste and minimise contaminants to the air and surrounding waterways. This could further worsen the environmental impacts going forward.
26. There is also no management plan associated with this consent application which was noted by Van Kekem as a concern.

The decision we want the consent authority to make is to decline this Resource Consent application in its entirety

I am available to be heard in support of my submission if required.



Michelle Mace