

FORM521: SUBMISSION ON AN APPLICATION FOR A RESOURCE CONSENT BY A PERSON ON WHOM NOTICE OF THE APPLICATION HAS BEEN SERVED

SECTION 96 RESOURCE MANAGEMENT ACT 1991

TO: Consents Hearings
Environment Canterbury
PO Box 345
Christchurch 8140

Email: hearings@ecan.govt.nz

Ph: (03) 353 9007 Fax: (03) 365 3194

FOR OFFICE USE ONLY

File: CRC194083

- 5 MAR 2020

Closing Date: 5pm Wednesday 4 March
2020**I/We have been limited notified for the consent applications listed below**

Property Owned/Occupied:

2 Busch Lane, Halswell, Christchurch, 7676

Full Name of submitter:

Hanan Aladeen

Address For Service:

Contact Phone No(s):

Fax/Email Address:

☐: - Please tick this box if you do not want to receive communications on the process, and hearing via email

Contact Person:

Hanan Aladeen

Name of applicant:

Waste Management NZ Limited

Consent Application:

CRC194083

1. ☐ I/We support the application ☒ I/We oppose the application
☐ I/We are neutral to the application (neither support or oppose)
2. The reasons for making my submission are: (state in summary the nature of your submission, giving reasons)

3. I wish the consent authority to make the following decision:
(give details, including the general nature of any conditions sought. Please attach additional pages if required)

4. ☒ I/we **do** wish to be heard in support of my/our submission*

(Note: this means you wish to speak in support of your submission at the hearing)

*If others make a similar submission, I will consider presenting a joint case with them at the hearing ☐ Yes ☐ No

- ☐ I/we **do not** wish to be heard in support of my/our submission

(Note: this means you cannot speak at the hearing, however you will retain your right to appeal any decision to the Environment Court on any decision made by the Council.)

5. ☐ I/we am a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I/We am/am not directly affected by an effect of the subject matter of the submission that a) adversely affects the environment; and b) does not relate to trade competition or the effects of trade competition.

Hina

Signature of submitter or duly authorised agent on behalf of submitter

24/2/2020

Date _____

Notes to the submitter:

1. *The person making this submission must send a copy to the applicant as soon as reasonably practicable after serving Environment Canterbury*
2. *A list of all submissions received will be provided to the applicant*
3. *Privacy: Please note that submissions are public. Your name and submission (excluding your contact details) will be included in papers that are available to the media and public which may include publication on the Council website. Your submission will only be used for the purpose of the notified resource consent process.*

APPLICANT

WASTE MANAGEMENT NZ LIMITED

COUNCIL

CANTERBURY REGIONAL COUNCIL

**SUBMISSION IN OPPOSITION TO THE GRANT OF RESOURCE CONSENT
BY HANAN AL ADEM**

20 February 2020

To Canterbury Regional Council

DISCHARGE PERMIT APPLICATION CRC194083 – WASTE MANAGEMENT NZ LIMITED (the “Application”)

Submission of Hanan Al Adem

*2 Busch Lane
Prebbleton*

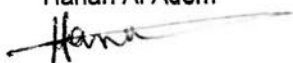
- 1 I am the owner of the property at 2 Busch Lane, Prebbleton. Busch Lane runs off Springs Road, and the Christchurch City Council is the relevant local authority for my property. My house is to the North East of the Waste Management site. The title to the property is in my name and that of my late husband. My husband died on 15 March 2019. I live at the property with my two sons, Husam Hamid who is 23 and Mohammed Hamid who is 21. This property has been our family home since 2012.
- 2 Being served with the notice by Ecan addressed to me and my late husband informing me of the proposal by Waste Management has been greatly upsetting to me. Making this submission and participating in the hearing is adding to a very difficult time for my family. However, I believe I must speak up on behalf of my family and my neighbours and express my extreme concern about the application and the impact it will have on my property.
- 3 I strongly object to the way in which the site location and sensitivity of the receiving environment is described in the application. Individual engineering and manufacturing premises are named. There is no reference at all to there being residential homes close by (including directly over the road from the site). Nor is there reference to the school, childcare centre or the village of Prebbleton within 520m of the site. My own house was not even identified by Ecan, and I was not served with the application until more than two months after the original submitters. In the other direction are established communities in South Hornby and large areas of rezoned land in Halswell which are now residential developments. It is wrong that the application refers to individual industrial businesses by name when they are located some distance from the site, but does not refer to any houses and families at all.
- 4 My property is 4 acres in size. It is in a gated community known as Parc Provence. The community has nicely manicured residences with a high degree of amenity value. We have a large outdoor garden in order to enjoy a semi-rural lifestyle while still being close to the city. We are surrounded by trees and fresh air. The nearby road (Springs Road) currently has higher than usual traffic volumes due to the construction of the Southern Motorway extension. Once that is complete Springs Road will have significantly lower traffic volumes.

- 5 I am extremely concerned about the impact that this proposal may have on my home and my neighbours if this is allowed to proceed. I highly value the peace and tranquillity of my home and garden, as do my sons. I cannot believe that I am having to bear this burden when the effects of this discharge are uncertain.
- 6 The relevant standard used to determine the extent of the notification zone does not say there will be no effects beyond the 500m point but instead is a "clearance zone" within which there should be no residences or businesses nearby. I do not understand how this can proceed when there are many residences within the zone, and a large residential village just beyond the 500m point. This is a new activity, and yet it is being proposed next to one of the oldest European settled areas of Canterbury.
- 7 I am seriously concerned about odour. This will have an effect on my use and enjoyment of the property, and my sons' use and enjoyment of the property. The applicant accepts that there will be odour, but relies on its systems to minimise its effects. The application says that odour is "not expected to be observable at these locations during normal operation of the site. Upset conditions or failure of the treatment systems, which could give rise to more significant odour emissions, are a very rare occurrence". It is not clear what is meant by "very rare" or "more significant odour emissions". I do not see how there can be a proper assessment of effects when there is a bland statement in the application, without apparent backing, that something will be "very rare". If the effects are significant, then the possibility they may happen infrequently is not relevant. I do not accept however that this is likely to be very rare given the vagueness in the application, and it is completely reliant on the systems working as expected.
- 8 The application relies on the operating systems of the current plant at Bromley – but that plant has had a number of odour issues and breaches of its consents. It describes the positive effects of the facility as being that it will be the newest modern hazardous waste facility in New Zealand. But it relies on the same operating system as the current Bromley system which has had complaints – stating "the main odour generating activity will be the organic waste processing plant...the same approach is used that (sic) the existing Bromley plant".
- 9 We grow fruit and vegetables for our own consumption in our garden. I am concerned of the impact that dust may have on this and what dust may be contaminated with. The application states that "for the majority of the time the material will be to (sic) damp to give rise to any dust". It therefore accepts that there will be dust. Again, this is not statistically referenced – so it could mean that 51% of the time (a majority) there will be no dust.
- 10 I am also concerned about the accumulated particles, particularly when the new Southern Motorway commences operation. The effects on health appear uncertain. The application states the site is "at least 750m from the nearest residential location which is expected to be a source of fine particulate matter less than ten microns...during winter months as a result of

domestic fires". This statement is not correct. Most of the homes within the notified zone have domestic fires. There is no mention at all of the cumulative effect of the motorway transport.

- 11 The re-zoning of the site to industrial and then heavy industrial was recent – when my subdivision was established, the land in question was rural. Everyone has established houses and lifestyle blocks, and the Prebbleton Community itself has grown immensely too. This is an area that people highly value for its good land, high quality soils and rural atmosphere.
- 12 I seek the relief that the application be refused or alternatively that stringent conditions be imposed to avoid or mitigate the adverse effects of the proposed activity on the following areas:
 - Odour emissions;
 - Immediate adverse health effects such as, but not limited to, irritation of eyes and respiratory system, headaches, nausea and other adverse reactions to the contaminants discharged;
 - Long term health risks, such as those that may arise in conjunction with contaminants' carcinogenic properties, including effects of low probability but high potential impact;
 - Contamination of soils, plants, processes and produce;
 - Adverse effects on the health and amenity expectations of my residential tenants; and
 - Cumulative adverse effects.
- 13 I consider that any resource consent, if granted, should only be consented for a short period, with extensive monitoring conditions. The potential adverse effects on neighbours, the community and the environment are extensive, and so must have the opportunity to be fully reassessed in several years, once these effects are realised.
- 14 This application should have been publically notified, and the activity is inconsistent with the Canterbury Regional Air Plan and is inconsistent with the purpose and policy of the Resource Management Act.

Kind regards,
Hanan Al Adem



Address for service

Please ensure that any further communications are served on both of the following parties:

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Mail: c/- Duncan Cotterill
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Hanan Al Adem

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