

Response

## To the Commissioners

**Re: Comments on Amended documents for Re-zoning a rural site within the Waimea River Park Reserve to allow for heavy industry and emitting discharges of contaminants into the air.** These are the base considerations for allowing the proposed hot mix asphalt plant to operate at this site and neither condition has been adequately supported by the applicant.

In my considered opinion, the response of the applicants and their offered lengthy conditions as outlined for operation of proposed plant arise from the one basic problem, that is that the proposed site is high risk for many reasons and therefore should not be located here.

You have received 47 applications against this proposal from locally affected residents and horticulture producers that feel deeply affected and upset by the siting of this proposed asphalt plant on Bartlett Road. They face the consequences of permitting heavy industry to operate in an established rural zone that would be discharging contaminants into the air and creating high traffic loads at extended operating hours. These applications are only from people that have been notified of the proposed plant, the wider community is still unaware.

Location of this plant next to the river and above the Aquifer supplying Richmond's water for the next 20 years will anger wide sectors of the community. There is keen sense of environmental awareness in this region. There are problems with clean drinking water, rivers clean enough for recreation and a lot of attention particularly on the Waimea river as a result of the dam under construction. Allowing this heavy industry in a rural zone to progress and doing so while also requesting special permission to emit hazardous substances into the air shows no justification.

It also presents many lost opportunities for opening this Council owned site up to rehabilitation, recreation and enhancement of the river environment for the community. These concerns have been indicated by many in their submissions and need to be taken seriously.

### Discharge of contaminants

There is no question that the operation of a hot-mix asphalt plant places contaminants into the air. Lengthy discussion has been presented the documents and amendments to downplay this issue and many assurances made that this is not a problem and can be controlled by the applicant. In their initial application, the table of potential contaminants listed is very limited and does not discuss the other volatiles and heavy metals that are associated with asphalt plants. This omission is continued in these amendment documents. The idea that particulate matter (PM10 and PM2.5) will be monitored once a year is totally inadequate and dangerous.

There are potentially very serious consequences to agricultural produce and the health of workers and residents if any air quality standards are breached. A hot mix asphalt plant presents many risks that both of these documents highlight with the range of supposed protocols in place as 60 metres from the site. They have extensive sampling and monitoring protocols and spectrophotometer analysis can detect a wide range of contaminants. For this reason other countries limit asphalt plant siting to no closer than 0.5-3 km from sensitive zones.

Council needs a better way to manage risks to residents and that has been done by the creation of industrial parks located in non-sensitive areas with reduced risks to the community.

Other statements in the amended documents are that discharges are "directed vertically into air and emissions are kept to a practical minimum". Does this suppose that directing discharges "vertically into the air" prevents wind and inversions from keeping emissions away from agricultural produce surrounding the site? Keeping emissions to a 'practical minimum' is open to great interpretation and does not represent proper and thorough monitoring of hazardous materials within close proximity of food crops. What will be the outcome if any number of potential

contaminants are picked up by MPI in export consignments which are strictly regulated and monitored by spectrophotometric analysis? Export markets could be lost for an entire crop and damages would have to be sought. Who is looking after the very real concerns of horticultural producers?

With such an industry to be located in a sensitive zone near agricultural produce, particularly berries and vegetables, there would need to be continuous monitoring of air quality, particularly levels of PM and VOCs. There is no margin for error.

The councils response document to the applicants amended conditions states "The discharge shall not cause odour or particulate matter that is offensive or objectionable beyond the boundary of the Application site"

How to you quantify what is offensive or objectionable? How is this being monitored? Is the burden of proof of harm left to the residents and farm workers? The presence of any harmful particulate matter including other contaminants in the air we breath is a frightening prospect for those of us who live near the site of the proposed plant and that prospect alone is already offensive and objectionable.

Oversight- With so many details outlined in these documents for operation of the plant at this site involving hazardous substance handling and complex traffic conditions how would the council be monitoring any breaches in compliance. Who will monitor visible smoke emissions when the plant is operating even in darkness? A log of complaints kept by the operators and potentially reviewed by Council is not adequate and responsive to the community. The compliance team at council is understaffed not in the position to take on a the role of properly monitoring such an operation near sensitive food crops and environments.

The very fact that hazardous chemical spillage is considered in the report points out the very real risk of contamination of the aquifer that supplies much of Richmond's drinking water. This is a very unacceptable risk and certainly should be put to the wider community before any approval is granted for siting of this plant.

### **Consideration of Alternative sites**

There are no compelling reasons to locate this plant at the Bartlett Road site. Gravel will be brought in from other sites along the river and can just as easily be carted on service roads and arterials and not through residential districts.

There are industrial parks and siting located all along lower Queen street in Richmond as well as other industrial sectors throughout the region. These were developed to group industries that present hazards so they would not be scattered widely among the community thus minimising any risks involved. These risks include those that have the potential to pollute the environment through air or soil discharge or have other adverse effects including noise, light nuisance, traffic burdens and danger with exposure to hazardous chemicals.

Lower Queen street industrial areas have direct access to main arterial roads that are distant from sensitive agricultural crops and do not necessitate travel through dangerous intersections, residential districts and schools. Any air emissions from operations are modified by their vicinity to open water with less fallout on to land with crops and people who are working or living in the immediate vicinity.

The most recently built industrial park is located 1.2 km from SH6 and 1.5 km from the site on the Waimea River which currently supports the gravel industry.

It is not clear that due consideration and support have been given by Tasman District Council to allow for the provision of alternative sites that are more suited for this Asphalt proposal if an alternative source of asphalt for the region is deemed necessary.