PLANNING REPORT

BY: Consultant Planner: Alex Strawbridge

DATE: 17 April 2015

SUBJECT: **RESOURCE CONSENT APPLICATION 145650**

Applicant:	Pest Control Research LP
Proposal:	To store and manufacture bait products.
Location:	8 Centrum Lane, Izone Business Park, Rolleston.
Legal Description:	Lot 636 Deposited Plan 464084 being 1598 square metres in area more or less, as contained in Certificate of Title 615761.
Zoning:	The property is zoned Business 2A under the provisions of the Partially Operative District Plan (Township) Volume.
Status:	This application has been assessed as a landuse consent for a discretionary activity under the Partially Operative District Plan. As such the relevant provisions of the Partially Operative District Plan (Township) Volume and the Resource Management Act 1991, have been taken into account.
This application was formally received by the Selwyn District Council on 5 December 2015. Assessment and approval took place on 20 April 2015 under a delegation given by the Council.	

1. Proposal

Background

1.1 Pest Control Research LP (PCR) is a Canterbury business established fourteen years ago with the goal of developing and improving technology for vertebrate pest control, monitoring and ecosystem management in New Zealand. The company is the only privately owned manufacturer of non-toxic cereal bait for vertebrate pest control in New Zealand, and is a preferred supplier to a number of South Island contractors. In addition to the manufacture of non-toxic bait, PCR also undertakes the manufacture of several Pindone bait products, and other product lines including traps, monitoring devices and associated consumables.

1.2 PCR's existing manufacturing building was damaged by the Canterbury earthquakes of 2010 and 2011, making it difficult to secure against vermin and avian pests which frequently damage raw materials and finished product. In addition, PCR has stated that the existing site is not suitable for the growth of their business, and is also located within a zone where the type of manufacturing proposed is not supported by planning requirements.

1.3 PCR has therefore leased newly constructed premises located at 8 Centrum Lane, Rolleston, and proposes to relocate its administration, manufacturing, warehousing and distribution operations from several existing sites spread around Christchurch to this one location.

The Proposal

1.4 The application was received on 5 December 2015. Requests for further information were made on 11 February 2015 and 13 March 2015 and responses to these were received on 2 March 2015 and 15 March 2015 respectively.

1.5 The application is for activities associated with the manufacture and storage of a range of ready to use bait products containing one of several hazardous substances as the active ingredient. Such products are widely used for the control of vertebrate pest species including possums, rodents and rabbits.

1.6 Ready to use cereal pellet baits will be made to a variety of formulations and physical sizes, and each product line will have one of the following active ingredients - Brodifacoum, Cholecalciferol, Pindone or Sodium fluoroacetate (1080).

1.7 All the active ingredients are manufactured overseas and shipped to New Zealand from time to time, as demand requires. No chemical manufacturing processing will be undertaken on site.

1.8 The manufacturing activities on site will entail storage of both the active ingredients and manufactured products at the site in quantities (shown in Table 1) exceeding the permitted activity threshold, as detailed in the Partially Operative District Plan. The manufacture will be undertaken using a dedicated plant with a production capacity of 1500 kg/hour.

Table 1: Proposed storage quantities

Active ingredient	Active ingredient quantity (kg)	Manufactured product quantity (kg)
Brodifacoum	1,000	100,000
Chloecalciferol	1,000	100,000
Pindone	1,000	200,000
Sodium fluoroacetate (1080)	1,500	200,000

1.9 Manufacturing will be undertaken in a purpose designed facility, using a high-quality pellet press and associated mixing, loading, cooling, screening and packaging machinery of the type commonly used for the manufacture of stock-feed and similar products. The pelletising process uses a radial ring pelletiser to rupture starch contained in the constituent grains by a combination of moisture, heat and pressure.

1.10 Other than when received inwards from time to time, active ingredients will only be handled during transfer from the dangerous goods storage facility to the laboratory, and from the laboratory to the batch mixer. To minimise the risk of particulate transfer outside the factory environment the active ingredients will only be handled, decanted and weighed by appropriately certified and skilled personnel wearing suitable Personal Protective Equipment (PPE) for use only within the laboratory environment.

1.11 It is expected that most activities at the site will normally be conducted during the hours of 7am to 6pm from Monday to Friday, although operations may be required outside of these times periodically.

Details of storage

1.12 Active ingredients specified in the application are supplied in powdered form and will be stored within a designated dangerous store located inside the laboratory within the building envelope.

1.13 This storage is based on a converted shipping container and incorporates secondary containment for substances stored within.

1.14 Being water tight the store is unlikely to be adversely affected by any seismic event, including water inundation caused by liquefaction, or by sprinkler activations following a fire.

1.15 Manufactured product will be stored on 100 mm wooden pallets inside the building either placed onto the floor or onto single tier seismic racking with a beam height of 1.85m and a rated capacity of 2,400kg per beam.

1.16 Manufactured products are stored in impermeable packaging to prevent spoilage from atmospheric moisture and evaporation of attractants incorporated in the product.

1.17 The building envelope has been constructed so as to be bird-proof. Mouse traps and bait stations will be located at a number of sites within the building envelope. Regular inspections will take place to ensure that any invasion of avian and rodent pests are managed appropriately.

1.18 There will be no storage of manufactured product outside the building envelope.

Manufacturing Process Steps

1.19 The dust containment system is activated and allowed to perform its self-checking cycle to identify any preventative maintenance that may be required. The hopper will be placed into position.

1.20 Plant and equipment are inspected to ensure they are not contaminated by residue from prior batches or other products, and the pellet press die and cooling cycle are configured for the product being manufactured.

1.21 Next, the batch quantity is determined before requisite quantities of active ingredient and bulk excipients are added to the paddle mix hopper and weighed using an integrated load cell.

1.22 The paddle mixer thoroughly combines all components before the batch is elevated to a feed hopper for the pelletiser where further conditioning takes place to ensure optimum moisture content is attained.

1.23 The now homogenous mass is fed into the pellet press using a variable speed auger which ensures a consistent flow of material. Baits are extruded through a die and cut to length by mechanical shear as the apparatus revolves.

1.24 Bait then undergoes a cooling cycle during which a fan forces air through the bait to reduce the temperature to approximately room temperature.

1.25 Following the cooling cycle bait is sieved to remove any pellets not meeting the release specification, with non-conforming pellets recycled back into the manufacturing process.

1.26 After sieving the bait is transferred into the bagging-off hopper to be packaged and labelled before transfer to storage or distribution.

1.27 A sample of bait from every batch is diverted for analysis to ensure that ingredient content and physical properties are within the release specification.

Transportation

1.28 Inwards active ingredients are moved by specialist chemical transport companies to comply with insurance requirements, and deliveries will typically be required a maximum of six times per annum subject to demand.

1.29 Outwards goods will be moved by small number of operators with expertise in the transportation of bulk dangerous goods. Such operators have a high degree of competence with the carriage of these substances and the necessary requirements such as packaging and loading to comply with the Land Transport Rule for Dangerous Goods.

Waste and Disposal

1.30 The estimated volume of solid waste that will be generated at the site is shown in Table 2:

Table 2: Estimated volume of solid waste

Category	**Volume (m^3/month)**
General waste (non-toxic)	4-6
Contaminated waste	<1

1.31 The volume of waste generated from activities at the site is likely to vary considerably throughout the year according to customer demand for products intended to be manufactured there.

1.32 With regard to disposal, the applicant utilises the services of a contractor for disposal of waste from its existing site. This arrangement will be continued when the applicant begins operating from 8 Centrum Lane. There is no proposal to utilise any refuse facilities that may exist in the Selwyn District for disposal of waste containing toxins.

Compliance with other legislation

1.33 All hazardous substances are required to have approval under the Hazardous Substances and New Organisms (HSNO) Act, which imposes controls that are designed to manage any risk from using, storing, transporting and disposing of the substance. Such legislation applies to the management of both active ingredients and formulated products. The Environmental Protection Authority (EPA) administers the HSNO Act. PCR will be seeking EPA approval for several ready-to-use bait formulations containing the active ingredients as set out in the application.

1.34 The Ministry for Primary Industries (MPI) is responsible for the administration of the Agricultural Compounds and Veterinary Medicines (ACVM) Act and associated regulations which seek to manage risks to animal welfare, agricultural security, public health and trade from the use of agricultural compounds which includes most ready to use bait formulations containing a hazardous substances as the active ingredient. PCR is seeking registration from MPI for a number of ready-to-use bait formulations containing the active ingredients as set out in the application. PCR is also an approved manufacturer of ready-to-use bait formulations at its existing site in Christchurch and is seeking MPI approval to transfer manufacturing activities to the new site at 8 Centrum Lane.

1.35 Worksafe New Zealand is the government agency responsible for administration of the Health and Safety in Employment (HSE) Act and associated legislation. HSE legislation seeks to manage hazards to employees, contractors and other persons that may be

harmed as a consequence of activities in a workplace. Worksafe New Zealand also undertakes certain regulatory functions pursuant to the HSNO Act including the certification of persons seeking statutory licences and the enforcement of HSNO legislation in a workplace context. All PCR employees are Approved Handlers and holders of a Controlled Substance Licence for all substances the business is approved to manufacture.

2. Site and Locality

2.1 The property subject to this application is Lot 636 Deposited Plan 464084 being 1598 square metres in area more or less, as contained in Certificate of Title 615761. The street address is 8 Centrum Lane, Rolleston. The site is located within the Izone Business Park.

2.2 Both Centrum Lane and Link Drive (which Centrum Lane is connected to) are formed and sealed roads with no classification under the Partially Operative District Plan.

2.3 The site is surrounded on all sides by industrial activities or vacant land awaiting development. Industrial activities in the surrounding area include coal yards, timber processing, seed processing, building prefabrication, heavy engineering, a dairy factory and a distribution centre.

2.4 The nearest residential land is situated approximately 400m to the east. Beyond the industrial development, the surrounding land use is predominantly taken up by farming. There are no locations with a high sensitivity such as hospitals or schools immediately adjacent or in the near proximity to the site.

2.5 Lot 636 is located on flat land. The site and surrounding area are not known to have suffered any liquefaction or other damage during the Canterbury earthquakes of 2010 and 2011. Other than stormwater reticulation the nearest surface waterway is located approximately 400m away near Hoskyns Road. The area is characterised by generally moderate to low wind speeds, less than 5 m/s, which occur for about 73% of the time.

2.6 The site itself contains a 10m high building of approximately 900m² in floor area. An office and amenity complex occupy approximately 50m² in a corner at the front of the building. A small laboratory is annexed to the rear of the office for analysis and quality assurance purposes.

2.7 The building is sited at the rear of the property and extends to the rear and side boundaries. The remaining area at the front is taken up with bitumen surfacing for vehicle handling and car parking, and landscaping to comply with the Izone Business Park master plan, and building consent requirements.

3. District Plan

3.1 The property is zoned Business 2A under the District Plan (Townships Volume).

4. Weighting of Plans

4.1 The District Plan was made Partially Operative on the 10 June 2008. Those parts of the District Plan relevant to this proposal are operative. Accordingly the Transitional District Plan has been disregarded in this instance.

5. Relevant Rules

Partially Operative District Plan – Landuse

5.1 The rules relevant to the proposal are assessed in Table 3 below:

Table 3: Assessment of proposal against the relevant rules of the Partially Operative District Plan

Rule	Assessment	Activity status
Rule 20.1.1: *The storage of any hazardous substance shall be a permitted activity if all of the following conditions are met:* *20.1.1.1 - The quantity of each subclass of hazardous substances listed in Appendix 9 Table E9.2 complies with the maximum storage quantities set out in Appendix 9 Table E9.2.* *20.1.1.2 - Any area used to store any hazardous substance or goods treated with any hazardous substance, except for Liquefied Petroleum Gas (LPG) is:* *a) separated from the bare ground area by an impervious surface; and* *b) the impervious surface is designed to contain any runoff of the substance or water contaminated with the substance; and* *c) the amount of containment available is no less than 110% of the total volume of stored hazardous substance where the area is roofed; or* *d) the amount of containment available shall be no less than 120% of the volume of any stored hazardous substance where the area is unroofed.* *20.1.1.3 - Any hazardous substance is stored:* *a) in a sealed container; and* *b) the container is made of a material that is not weakened or corroded by the hazardous substance; and* *c) the container is permanently labeled with the name of the contents; and* *d) only one type of hazardous substance is stored in each container.* *…* *20.1.1.5 - Any hazardous substance(s) is/are not stored within 20 metres of any waterbody.*	The proposal is to store hazardous substances (Brodifacoum, Chloecalciferol, Pindone and Sodium fluroacetate (1080)) in volumes which exceed the limits set out in Appendix 9 Table E9.2 of the Partially Operative District Plan. The area used to store the hazardous substances is designed to comply with Rule 20.1.1.2. The hazardous substances will be stored in compliance with the requirements of Rule 20.1.1.3. The hazardous substances will not be stored within 20 metres of a waterbody.	Due to non-compliance with Rule 20.1.1.1, the proposal is a discretionary activity under Rule 20.1.3.
Rule 20.2.2: *The following shall be discretionary activities:* *20.2.2.1 – The manufacture of any hazardous substance in the Business 2, 2A or 2B Zone as either a product or by-product.*	The proposal is to manufacture products containing hazardous substances.	The proposal is a discretionary activity under Rule 20.2.2.1.
Rule 17.5.1: *Any activity which provides for car parking, cycle parking, vehicle loading and parking access in accordance with the following conditions shall be a permitted activity:* *17.5.1.1 - The number of car parks provided complies with the relevant requirements for the activity as listed in Appendix E13.1.1, E13.1.2 and E13.1.3; and*	The car parks provided on the site are largely in compliance with Rule 17.5.1.1, with some small non-compliances in the dimensions of some car parks provided. Car parking spaces and manoeuvring areas meet the requirements listed under Rule 17.5.1.2 (although it is unclear whether the illumination	Due to non-compliances with Rule 17.5.1.1, the proposal is a restricted discretionary activity under Rule 17.5.2. In this regard it is noted that the building itself and the carparks are existing. However, these rules have been

17.5.1.2 - All car parking spaces and vehicle manoeuvring areas are designed to meet the criteria set out in Appendix E13.1.5.2, E13.1.6 (if applicable), E13.1.7, E13.1.8, E13.1.9, E13.1.10, E13.1.11 and E13.1.12 for all activities; and *17.5.1.3 - Each site that is used for an activity which is not a residential activity and which generates more than 4 heavy vehicle movements per day has one on-site loading space which complies with the requirements set out in Appendix E13.1.5. The loading space does not count as a car parking space for the purpose of Rule 17.5.1.1; and* *17.5.1.4 - Each site that is used for an activity other than a residential activity has one car park space for mobility impaired persons for up to 10 car parking spaces provided, and one additional car park space for a mobility impaired person for every additional 50 car parking spaces provided or part there-of; and* *17.5.1.5 - Car parking spaces for mobility impaired persons are:* *a) Sited as close to the entrance to the building or to the site of the activity as practical; and* *b) Sited on a level surface; and* *c) Clearly marked for exclusive use by mobility impaired persons; and* *17.5.1.6 - Cycle parking spaces are provided in accordance with the standards in Appendix 13.1.4.*	required under E13.1.11 is currently provided). The site contains an on-site loading space in compliance with Rule 17.5.1.3. The number and location of mobility parks provided on site meet the requirements of Rules 17.5.1.4 and 17.5.1.5. Cycle parking spaces are provided in accordance with Rule 17.5.1.6.	included for completeness.
Rule 21.1.1: *Any activity, that is not a residential activity, which generates 3 cubic metres or less of solid waste on average per week over a year shall be a permitted activity.*	The proposal will generate approximately up to 7m³ of solid waste per month, and therefore meets the requirements of Rule 21.1.1.	The proposal is a permitted activity under Rule 21.1.1.
Rule 21.2.1: *The storage of solid waste shall be a permitted activity if the following conditions are met:* *21.2.1.1 - Only solid waste generated as part of activities on a site is stored on the site; and* *21.2.1.2 - Any solid waste stored on a site is stored in a closed, waterproof container; and* *21.2.1.3 - Solid waste is only stored on-site until it is able to be collected or removed for treatment or disposal elsewhere.*	The proposal will be able to meet the requirements of Rule 21.2.1.	The proposal is a permitted activity under Rule 21.2.1.
Rule 22.4.1: *Any activity conducted on any day, except any residential activity, shall be a permitted activity, provided that the following noise limits are not exceeded with the time-frames stated.* ***Business 2A Zone:***	Noise produced on the site will relate to the operation of manufacturing plant and vehicle movements. Manufacturing will only take place with all exterior doors closed. Vehicle movements will be of a volume associated with a typical industrial manufacturing	The proposal is a permitted activity under Rule 22.4.1.

22.4.1.5 - Applying at any point within the boundary of any site in the rural zone, excluding road, waterway and railway reserves: *7.30 am – 8.00 pm 60dBA L10* *8.00 pm – 7.30am 40dBA L10* *7.30 am – 8.00pm 80dBA Lmax* *8.00 pm – 7.30 am 65dBA Lmax*	activity. In addition to this, the site is some distance from the nearest boundary to a rural zone. It is therefore assessed that the proposal will have no issues with complying with the noise limits under Rule 22.4.1.	

5.2 Overall, the landuse proposal is therefore a **discretionary** activity in terms of the Partially Operative District Plan.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

5.3 The activity will not involve the disturbance of any land on the site and therefore the application is not subject to the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.

6. Statutory Requirements

6.1 The statutory requirements of the Resource Management Act 1991 in respect of this application are Sections 95 – 95E, 104, 104B and 108.

7. Notification

7.1 The effects of this proposal on the environment are considered to be less than minor, and so the application need not be notified pursuant to section 95A of the Resource Management Act 1991.

7.2 The proposal is considered to have less than minor effects on any party, therefore no parties are considered affected and so under Section 95B of the Resource Management Act 1991 limited notification is not required.

7.3 A report has been prepared separately to this report which contains a full assessment of the proposal against Sections 95-95E of the Resource Management Act 1991.

8. Section 104 Matters

8.1 Section 104(1) of the Resource Management Act 1991 sets out the matters which must be considered by Selwyn District Council in considering an application for resource consent. In this case the relevant matters include:

- Any actual and potential effects of allowing the activity (s104(1)(a));
- The Canterbury Regional Policy Statement (s104(1)(b));
- Any Plan or Proposed Plan (s104(1)(b)); and
- Other regulations (s104(1)(b)).

8.2 All matters listed in s104(1) are subject to Part 2 of the Act which contains its purposes and principles.

8.3 Section 104B, which relates to determining discretionary activities, states:

After considering an application for a resource consent for a discretionary activity or non-complying activity, a consent authority –

(a) may grant or refuse the application; and

(b) if it grants the application, may impose conditions under sections 108.

8.4 The above matters are addressed within Sections 9 to 20 below.

9. Assessment of Effects on the Environment

Potential for discharge of contaminants to air - dust

9.1 As the hazardous substances involved in this proposal are stored and largely handled as dry products, there is potential for dust containing these hazardous substances to spread throughout the premises and beyond.

9.2 To minimise risk of particulate transfer outside the factory environment the active ingredients will only be handled, decanted and weighed by appropriately certified and skilled personnel wearing suitable Personal Protective Equipment (PPE) for use only within the laboratory environment.

9.3 While being handled during preparation for the manufacturing process, the active ingredients will be placed on a minor excipient bench, fitted with a fume hood to extract and contain any particulate emitted during handling, and an impermeable surface with a raised edge to facilitate clean-up of any spillage during handling.

9.4 Potential sources of dust from the manufacturing plant include the mixing hopper where bulk ingredients are added at the beginning of the manufacturing process, transfer points where bait formulation moves from one machine to another, the cyclone fan where pelletised bait is cooled and the bagging-off area where products are packaged.

9.5 To reduce dust emission the mixing hopper will be covered after charging with raw ingredients, and process machinery is well sealed at transfer points to limit internal dust within the building.

9.6 The dedicated plant used for the production of bait containing toxins will be fitted with a dust containment system to collect dust at process transfer points, cooling fan and the bagging-off hopper.

9.7 The containment system will exhaust clean air to the factory interior and collect dust inside a wheeled hopper to be returned to the manufacturing process at intervals.

9.8 Failure of the baghouse dust containment system is unlikely given routine maintenance and replacement of filtration media, but in the event of a failure the system is programmed to automatically shut down the pelletising plant using an electrical interlock to ensure that no dust is discharged. The performance of this system will ensure that no contaminates are released during manufacture.

9.9 Immediately prior to bagging, all bait undergoes mechanical sieving to remove dust and non-conforming pellets, and the dust containment system includes interlocked ducting to collect dust from any process stages where it might conceivably be generated. Dust contained during the manufacturing process and non-conforming output is diverted to separate holding containers for remanufacture in subsequent batches.

9.10 The entire building will be thoroughly cleaned at regular intervals with dedicated industrial vacuums.

9.11 In addition, PCR has developed a Site Master File in accordance with the requirements under the ACVM Act which establishes controls and standards that must be complied with for each phase of manufacturing activity, as well as setting out general

requirements for worker health and safety, and the management of active and non-active ingredients to prevent undue risk.

9.12 As stated in the accompanying report by Tonkin & Taylor, due to the range of precautions discussed above, discharge of contaminated dust when the vehicle access door is open appears very unlikely.

9.13 For all the reasons stated above, it is considered that the adverse effects of dust discharges as part of the manufacturing process are less than minor.

Potential for discharge of contaminants to air - odour

9.14 There is the potential for odour produced as part of the manufacturing process to create adverse effects on the environment.

9.15 A low level of odour from attractants such as cinnamon incorporated within manufactured bait, and the constituent grains such as wheat, barley and maize may be detectable within the factory building, or from a short distance away, when the vehicle access door is open.

9.16 While the surrounding industrial setting is not overly sensitive to such emissions, the vehicle access roller door will normally be kept closed while bagging is taking place to minimise any emission of odour.

9.17 Attractants such as cinnamon incorporated into most manufactured baits are slightly volatile and degrade in contact with oxygen, which necessitates bait being packaged into impermeable bags for maximum shelf life. This packaging greatly reduces odorous emissions of the type that could be produced.

9.18 It is therefore considered that the adverse effects of odour produced by the manufacturing process are less than minor.

Spills, leaks and other potential mismanagement

9.19 Despite standard safety procedures, there is the potential for accidents or unforeseen events to occur that could cause adverse effects on the environment. This could be caused by spills, leaks or other events such as pest incursion or security breaches.

9.20 The building floor is a concrete slab which has been coated with a high performance epoxy paint system to create an impermeable surface, and all construction joints have been sealed to prevent build-up of dust or spilt materials, as well as eliminate pathways for contamination of underlying ground strata.

9.21 A spill kit will be located inside the building to contain any spillage that could potentially occur while active ingredients are being decanted or measured within the dangerous goods store, transferred across to the plant and added to the mixing hopper.

9.22 To further reduce risks posed during transfer and mixing of active ingredients, these actions will only take place while the vehicle access roller door is closed, so if an incident does occur no particles will be transferred beyond the factory environment.

9.23 Any spillage of manufactured product will be in the form of cylindrical cereal pellets, or partly formed pellets (depending upon manufacturing phase), which contain active ingredient at relatively low concentration. As products containing vertebrate toxic agents are required to incorporate a green or blue dye to indicate toxicity, any spilt pellets will be readily identifiable against the grey floor coating so they can be easily contained and recovered.

9.24 The Site Master File (mentioned in section 9.11 above) includes procedures that must be complied with in the event of a spill, including immediate response action and reporting requirements. PCR has developed an Incident Response Plan that is included in the Site Master File.

9.25 To prevent avian and rodent pest incursions, and their potential subsequent death outside of the premises, the building has been constructed in such a way as to be bird-proof. Traps will also be set and the premises will be regularly inspected for the presence of pests, with appropriate actions taken if found.

9.26 In terms of the potential for the hazardous substances to be tampered with, all active ingredients are stored in a locked dangerous goods store located within the building. The dangerous goods store will be closed at all times except for receipting and decanting of chemicals as required. No manufactured product will be stored outside of the building. The building itself contains a security system and the property is surrounded by a security fence.

9.27 With the above mitigation in place to anticipate any unforeseen events that may produce adverse effects on the environment, it is considered that the adverse effects are less than minor.

Impacts on human health

9.28 The storage and use of the hazardous substances proposed have the potential to cause adverse effects on human health, both potentially for employees and for the wider public.

9.29 Personal Protective Equipment (PPE) is a health and safety requirement for persons engaged in the manufacture and handling of products containing vertebrate toxic agents. The use of process specific PPE protects the health of employees and prevents toxins from being unintentionally transferred outside of the building by routes such as contaminated clothing. Whilst equipment requirements differ according to process stage and the active ingredient being used, they will generally include full Tyvek style overalls, gloves, full face respirators and factory-only footwear.

9.30 Changing will take place in a specially designated area within the factory and staff must wash their hands immediately before leaving the factory environment.

9.31 With these precautions, and as concluded in section 9.12 above, the probability of contaminated dust escaping the building is considered to be very low and consequently the potential public health risk is also considered to be very low. It is therefore considered that any adverse effects on human health are less than minor.

Car parking

9.32 Some of the car parks provided for the activity are smaller in dimension than that required in the Partially Operative District Plan. This could cause adverse effects in terms of insufficient manoeuvring space for users of these car parks.

9.33 The non-complying car parks are located along the side boundaries of the front of the site. Under Appendix 13 Diagram E13.1, these car parks are required to be 2.5 metres wide and 6.1 metres deep. The site plan included with the approved building consent indicates that these car parks have been constructed at 2.4 metres wide and 5.4 metres deep.

9.34 The car parks have been created on the site as part of the information provided with the buiding consent application for the building to be used for the manufacturing process. Although these parks may not comply with the District Plan, the dimensions are unlikely to create an issue as the parks are likely to be only used by staff. The nature of the manufacturing process and activity on the site will not require large volumes of visitor traffic and it is not considered that there will be any adverse effects on any party, or on the surrounding area, as a result of the dimensions of the existing parks.

9.35 For these reasons, it is considered that the car park non-compliance will produce adverse effects that are less than minor.

10. The Canterbury Regional Policy Statement

10.1 The Canterbury Regional Policy Statement (RPS) provides an overview of the resource management issues in the Canterbury region, and the objectives, policies and methods to achieve integrated management of natural and physical resources. The methods include directions for provisions in district and regional plans.

10.2 Chapter 18 of the RPS sets out the regional objectives and policies relating to the management of hazardous substances.

10.3 Objective 18.2.1 aims to ensure that the adverse effects on the environment from the storage, use, disposal and transportation of hazardous substances are avoided, remedied or mitigated. Policies 18.3.1 to 18.3.5 set out actions for local authorities to create objectives and policies to direct the location and management of hazardous substances within their districts. By meeting the Selwyn District Council's objectives and policies for hazardous substances, this proposal is in line with the directions of the RPS.

10.4 This proposal is not considered to challenge any other provisions of the Regional Policy Statement.

11. Canterbury Regional Plans

11.1 While a comprehensive analysis of the proposal against the Canterbury Regional Plans has not been undertaken, it is understood that the proposed activity will not require resource consent under these Plans.

11.2 No discharges are proposed to land or water.

11.3 No point source discharges to air are proposed; however some discharge may occur to air as part of general ventilation of industrial or trade premises via windows, doors and vents. These discharges are covered by Rule AQL56 of the Canterbury Natural Resources Regional Plan. As set out in the accompanying report by Tonkin & Taylor, it is considered that the proposal will meet the permitted activity standards under Rule AQL56.

12. Objectives and Policies of the Partially Operative District Plan

12.1 The objectives and policies that are considered relevant are assessed in Table 4:

Table 4: Assessment of relevant Objectives and Policies of the Partially Operative District Plan

Objective/Policy	Assessment
Objective B3.2.1: *To ensure that adequate measures are taken to avoid, remedy or mitigate any adverse effects to human health, to the amenity of townships, the rural environment and to the natural environment arising from the manufacture, storage, transport on water bodies and disposal of hazardous substances.*	As discussed in section 9 above, appropriate management practices will be put in place to mitigate the adverse effects on the environment of the manufacture and storage of the hazardous substances involved in this proposal. The manufacture and storage of hazardous substances is being avoided in the Living and Business 1 Zones. Appropriate methods of disposal will be arranged for the proposed activity. It is noted that the risk associated with the proposal is also controlled and mitigated through other approval pathways. The Applicant has obtained, and is seeking, approval from the EPA for the use, storage and manufacturing of hazardous substances at the site. In addition, the manufactured product will require approvals under the ACVM Act. The risks associated with the
Objective B3.2.2: *To ensure that adequate measures are taken during the manufacture, storage and disposal of hazardous substances to avoid, remedy or mitigate any adverse effects to the health of livestock and other farm animals, of domestic animals, and of flora and fauna, and to the life-sustaining capacity and amenity values of waterbodies, land and soil resources.*	
Policy B3.2.1:	

Ensure any potential risk of adverse effects on the environment from spills, leaks or other mismanagement of hazardous substances is avoided or mitigated.	activity will also be thoroughly considered during the assessment of these approvals.
Policy B3.2.2: *Avoid the manufacture, use or storage of large quantities of hazardous substances in Living or Business 1 Zones, unless potential adverse effects on people's well-being and the amenity values of these zones will be minor.*	
Policy B3.2.3: *Mitigate any adverse effects on the environment from the manufacture, use or storage of hazardous substances in Business 2, 2A and 2B zones or the Business 3 zone.*	
Policy B3.2.5: *Avoid disposing of hazardous substances into sewage systems or on to land in townships.*	
Policy B3.2.6: *Ensure parties who manufacture or store commercial quantities or concentrations of hazardous substances have the means to dispose of hazardous substances and their containers without adversely affecting the environment.*	

12.2 It is considered that the proposal is consistent with the objectives and policies of the Partially Operative District Plan (Townships Volume).

13. The Recovery Strategy for Greater Christchurch

13.1 The Strategy's approach to recovery will guide and co-ordinate the work of all central government agencies involved in recovery activities in Greater Christchurch, and the strategic partners. A number of documents including district plans, regional policy statements and regional plans must not be interpreted or applied in a way that is inconsistent with the Recovery Strategy (S15 and 26(2) of the CER Act).

13.2 It is not considered that the proposal will compromise any of the visions and goals for the recovery as listed in Section 4 of the document.

14. The Land Use Recovery Plan (LURP)

14.1 The LURP has been approved by the Minister for Canterbury Earthquake Recovery and was gazetted on 6 December 2013.

14.2 The LURP sets a policy and planning framework necessary to:

- Rebuild existing communities
- Develop new communities
- Meet the land use needs of businesses
- Rebuild and develop the infrastructure needed to support these activities
- Take account of natural hazards and environmental constraints that may affect rebuilding and recovery.

14.3 The LURP identifies what needs to be done in the short and medium term to co-ordinate land use decision-making, identifies who is responsible and sets timelines for carrying out actions. It directs amendments to be made to Environment Canterbury's Regional Policy Statement, the Christchurch City Plan, the Selwyn District Plan and the Waimakariri District Plan.

14.4 The CER Act requires that any decisions on resource consents or notices of requirement, or changes to planning documents must not be inconsistent with the Land Use Recovery Plan.

14.5 It is considered that the application is consistent with the Land Use Recovery Plan.

15. Hazardous Substances and New Organisms Act

15.1 All hazardous substances are required to have approval under the Hazardous Substances and New Organisms (HSNO) Act, which imposes controls that are designed to manage any risk from using, storing, transporting and disposing of the substance. Such legislation applies to the management of both active ingredients and formulated products. The Environmental Protection Authority (EPA) administers the HSNO Act. PCR will be seeking EPA approval for several ready-to-use bait formulations containing the active ingredients as set out in the application.

16. Agricultural Compounds and Veterinary Medicines Act

16.1 The Ministry for Primary Industries (MPI) is responsible for the administration of the Agricultural Compounds and Veterinary Medicines (ACVM) Act and associated regulations which seek to manage risks to animal welfare, agricultural security, public health and trade from the use of agricultural compounds which includes most ready to use bait formulations containing a hazardous substances as the active ingredient. PCR is seeking registration from MPI for a number of ready-to-use bait formulations containing the active ingredients as set out in the application. PCR is also an approved manufacturer of ready-to-use bait formulations at its existing site in Christchurch and is seeking MPI approval to transfer manufacturing activities to the new site at 8 Centrum Lane.

17. Health and Safety in Employment Act

17.1 Worksafe New Zealand is the government agency responsible for administration of the Health and Safety in Employment (HSE) Act and associated legislation. HSE legislation seeks to manage hazards to employees, contractors and other persons that may be harmed as a consequence of activities in a workplace. Worksafe New Zealand also undertakes certain regulatory functions pursuant to the HSNO Act including the certification of persons seeking statutory licences and the enforcement of HSNO legislation in a workplace context. All PCR employees are Approved Handlers and holders of a Controlled Substance Licence for all substances the business is approved to manufacture.

18. RMA Purposes and Principles (Part 2)

18.1 The purpose of the RMA is to promote the sustainable management of natural and physical resources. In summary enabling people and communities to provide for their well-being, while sustaining resources and addressing any adverse effects.

18.2 The principles of the RMA relate to Matters of National Importance (none of these are considered relevant to this proposal), Other matters (including maintenance and

enhancement of the quality of the environment) and taking into account the principles of the Treaty of Waitangi.

18.3 Based on the assessment in this report, it is considered that the proposal is in accordance with the purpose and principles of the Resource Management Act 1991.

19. Summary

19.1 This application is to store hazardous substances (Brodifacoum, Chloecalciferol, Pindone and Sodium fluroacetate (1080)) and to manufacture and store bait products containing these substances.

19.2 The application is considered to be in accordance with the objectives and policies of the District Plan (Townships Volume). Effects on the environment are considered to be less than minor.

19.3 In summary, it is recommended that the application is in order for approval subject to certain conditions to mitigate potential effects on the environment.

20. Recommendation

Resource consent 145650 is **granted** pursuant to section 104B of the Resource Management Act 1991 subject to the following conditions imposed under section 108 of the Act:

1. That the proposal is carried out substantially in accordance with the information submitted with the application and further information provided.
2. That the security measures detailed in Section 6.7 of the application be adhered to at all times.
3. That the Consent Holder provides evidence of approval from the Ministry of Primary Industries for the formulation of ready-products containing Brodifacoum, Cholecalciferol, Pindone and Sodium fluoroacetate, prior to storage and manufacturing operations commencing at the site.
4. Prior to storage and manufacturing operations commencing at the site, the Consent Holder shall provide a copy of its approved Site Master File to the Selwyn District Council. The file shall be prepared in accordance with the Agricultural Compounds and Veterinary Medicines Act, and shall include controls and standards for each phase of manufacturing, general requirements for worker health and safety (including the management of active and non-active ingredients), and procedures that must be complied with in the event of a spill, including immediate response action and reporting requirements.
5. Prior to storage and manufacturing operations commencing at the site, the Consent Holder shall provide the names and contact details for key staff responsible for the implementation of the Site Management File, including emergency contact details.
6. Prior to storage and manufacturing operations commencing at the site, the consent holder shall prepare and provide to Council a Site Environmental and Operational Management Plan.
7. The plan shall include as a minimum the processes and procedures documented in the Site Master File, and include other procedures to prevent the migration of dust or other contaminants outside of the manufacturing building.
8. That records of site inspections and surveys be kept and made available to Council staff upon request.
9. That any parking and loading areas which are required at night shall be illuminated to a minimum maintained level of 2 lux, with high uniformity, during the hours of operation.

10. That pursuant to section 128 of the Resource Management Act 1991, the Council may review all conditions by serving notice on the consent holder within 1 month of any 12 month period following the date of this decision, in order to deal with any adverse effects on the environment that may arise from the exercise of this consent.

NOTES TO THE CONSENT HOLDER

a. Pursuant to section 125 of the Resource Management Act 1991, if not given effect to, this resource consent shall lapse five years after the date of this decision unless a longer period is specified by the Council upon application under section 125 of the Act.

b. In accordance with section 36 of the Resource Management Act 1991, the Council's standard monitoring fee has been charged.

21. Recommendation Approved:

I have read through this report in detail and reviewed the associated conditions and sought that condition 2 be added to the suite of conditions proposed. I am now satisfied with the recommendation to grant consent.

For the forgoing reasons set out above I have determined that resource consent 145650 to store hazardous substances (Brodifacoum, Chloecalciferol, Pindone and Sodium fluroacetate (1080)) and to manufacture and store bait products containing these substances be **granted** pursuant to section 104B of the Resource Management Act 1991 subject to the above conditions imposed under section 108 of the Act.

Date: 20 / 04 /2015

Dean Michael Chrystal

Commissioner