



Outdoor storage of tyres: reducing environmental risks  
Ministry for the Environment  
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## **Submission on the Proposed NES for the Outdoor Storage of Tyres**

1. The Hurunui District Council thanks the Ministry for the Environment for the opportunity to comment on the Proposed National Environmental Standard (NES) for the Outdoor Storage of Tyres.
2. The Hurunui District is located in North Canterbury. We have approximately 12,600 residents and cover an area of 8,646km<sup>2</sup> of predominantly rural land. Our District spans from the east coast to the Main Divide. The Hurunui District is primarily a primary producer characterised by small service towns and vast distances to markets.
3. As a District with vast expanses of rural land in close proximity to Greater Christchurch the outdoor storage of tyres is a current issue for our District. Council has a particular interest in the NES due to the large tyre fire in Amberley on 26-27 February 2018.
4. Council does not support the support the outdoor storage of tyres and supports the preparation of national standards to control this.

### ***Responsibility of the NES***

*Question 1: Do you agree with responsibility for the NES siting with regional councils rather than district councils? Why?*

5. In principle the Council supports shifting the responsibility of implementing and enforcing the NES to the regional council.
6. We recognise that regional councils are better placed to consider the effects on water bodies, the coastal environment, fire risk and leaching of contaminants. We consider that these are the most significant effects of the outdoor storage of tyres.
7. We have concerns about the ability to consider amenity effects from the storage of tyres as part of this process. However, we note we currently have no rules that control the storage of tyres and have not experienced significant amenity issues.
8. We also acknowledge the challenges territorial authorities have with existing use right provisions and believe the standards should apply to both new and existing tyre piles.

### ***Threshold for consent***

*Question 2: Do you support having a resource consent threshold for the outdoor storage of tyres below the previously proposed 200m<sup>3</sup>? Why?*

*Question 5: Which of the options (200m<sup>3</sup> or 100m<sup>3</sup>) for setting a resource consent threshold do you support? Why?*

*Question 6: How would the proposed options affect your business/ organisation?*

*Question 8: Do you agree with the proposed exemption from the resource consent requirement for farm silage tyres? Why? Why not?*

9. The Hurunui District is a predominantly agricultural district and the production and storage of silage is an important activity within our District. Council had concerns with the 2017 notified version as including silage tyres would put further unnecessary pressure on our rural communities.
10. Council agrees with the proposed exemption for silage tyres. There are already rules in the Canterbury Land and Water Regional Plan that control the effects of silage pits. These are generally consistent with the permitted activity requirements provided in the discussion document.
11. The discussion document states that silage tyres would be exempt from the requirement for a resource consent but would be subject to the permitted activity rule. It is unclear whether there would be a volume restriction associated with this.
12. Council is supportive of silage tyres having to meet the height and setback requirements but does not support introducing a maximum volume of tyres.
13. Council does not support the outdoor storage of tyres. In most instances there seems to be little advantage to this given the significant environmental and public health risks such piles can pose. Given this, we prefer the 100m<sup>3</sup> limit as it provides a stronger framework for mitigating key environmental and public health risks.
14. We have particular concerns regarding the ability to control and manage any fire risk and the potential short and long term resulting effects of this. We consider that the framework provided by the NES needs to be sufficiently strong to enable consents to be declined where they do not sufficiently address the potential risk.
15. Moreover, Council is concerned about how the volume is to be calculated as we note that the pile is unlikely to be stacked in perfect rows in consistent heights. To avoid arguments over whether a tyre pile is 98m<sup>3</sup> or 103m<sup>3</sup> it would be useful to have an agreed methodology for calculating the volume.

#### **Permitted activity rule**

*Question 3: Do you support the addition of a proposed permitted activity rule with requirements? Why? Why not?*

*Question 4: Do you have any suggestions on the indicative requirements in Table 1?*

16. Generally, Council does not support the outdoor storage of tyres. If smaller storage piles are to be allowed we are supportive of including a permitted activity rule with standards to cover smaller tyre piles. We see this as an opportunity to improve practices and prevent numerous smaller piles forming around the district.
17. The indicative requirements seem reasonable for this.

#### **General**

*Question 7: Do you think the scope of the proposed NES should be extended to include indoor tyre storage? Why? Why not?*

18. Council has not experienced issues with the indoor storage of tyres. However, we note that issues have occurred elsewhere in New Zealand. In particular indoor tyre storage may become more lucrative if there is tougher regulation regarding the outdoor storage of tyres.

Yours sincerely,



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