

From: [Roger & Linda](#)
To: [Mailroom Mailbox](#)
Subject: FW: Undeliverable: SUBMISSION PROPOSED CANTERBURY AIR REGIONAL PLAN
Date: Friday, 1 May 2015 5:43:18 p.m.
Attachments: [SUBMISSION PROPOSED CANTERBURY AIR REGIONAL PLAN.msg](#)

I trust this Submission will still be acceptable

Thank you

Roger Bray

From: postmaster@ecan.govt.nz [mailto:postmaster@ecan.govt.nz]
Sent: Friday, 1 May 2015 4:37 p.m.
To: birdsnbees@xtra.co.nz
Subject: Undeliverable: SUBMISSION PROPOSED CANTERBURY AIR REGIONAL PLAN

Delivery has failed to these recipients or groups:

From: [Roger & Linda](#)
To: mailman@ecan.govt.nz
Subject: SUBMISSION PROPOSED CANTERBURY AIR REGIONAL PLAN
Date: Friday, 1 May 2015 4:37:05 p.m.
Attachments: [air-plan-submission-form.pdf](#)
[Canterbury Air Regional Plan - Submission April 2015.pdf](#)

To Whom,

Please find attached our Submission to the Proposed Canterbury Air Regional Plan.

Thank you
Roger Bray

Cc: Hard Copy POSTED



FOR OFFICE USE ONLY

Submission on the Proposed Canterbury Air Regional Plan

Submitter ID:

File No:

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm, Friday 1 May 2015 to:

Freepost 1201
Proposed Canterbury Air Regional Plan.
Environment Canterbury
P O Box 345
Christchurch 8140

A
Full Name: Roger Bray Phone (Hm): 03 308 4964
Organisation*: _____ Phone (Wk): _____
* the organisation that this submission is made on behalf of
Postal Address: _____ Phone (Cell): _____
RD 1, Ashburton Postcode: 7771
Email: birdsnebes@xtra.co.nz Fax: _____
Contact name and postal address for service of person making submission (if different from above):

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- I could not gain an advantage in trade competition through this submission; or
- I could gain an advantage in trade competition through this submission. **If you have ticked this box please select one of the following:**
- I am directly affected by an effect of the subject matter of the submission
 - I am not directly affected by an effect of the subject matter of the submission

Signature: Roger Bray Date: 30-4-2015

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

B I do not wish to be heard in support of my submission; or

I do wish to be heard in support of my submission; and if so,

I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

C (1) The specific provisions of the proposal that my submission relates to are: <i>(Specify page number and subsection numbering for each separate provision).</i>	(2) My submission is that: <i>(State concisely whether you support or oppose each separate provision being submitted on, or wish to have amendments made and the reasons for your views.)</i>	(3) I seek the following decisions from Environment Canterbury: <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Refer to separate Attachment		

Add further pages as required.

Proposed Canterbury Air Regional Plan Submission – April 2015

As land owners in the lower Greenstreet area we have been included in the proposed Ashburton/ Hakatere Crop Residue Burning Buffer Area (CRBA).

It appears that the open air burning of crop residue, vegetation, paper, cardboard and untreated wood is to be under scrutiny, for this area. We see a gradual 'creep' of requirements on burning that tend to place restrictions on the location and timing of the burning rather than setting some guidelines for 'best practice'. In some instances setting defined timing of burning as well as minimum distances from 'sensitive activities' tends to concentrate those wishing to burn on the 'rules' rather than promoting initiatives that would promote 'responsible neighbour' behaviour. In the majority of cases the contaminants from a fire would be the same regardless of the position of a fire and the time of ignition.

Whilst we support the crop residue burning buffer area we also consider that in some cases crop residue may consist of trash that is impractical to dispose of by any other method than burning. There does appear to be provision for the burning of such residue but we consider a 'consent' should be easily obtained at no cost to the applicant. It is up to the farming community to develop methods of disposal of crop residue that promotes 'responsible neighbours'. There also needs to be some tolerance for activities that are 'rural' or farming in nature to be carried out in the defined areas and those living in the areas for 'lifestyle' should accept the need for farming to continue.

Rules 7.10 – pge 7-3.

We **SUPPORT** the burning of vegetation, paper, cardboard and untreated wood in the Rural area as a permitted activity.

However we have concerns on an 8ha site - boundary measurements are too restrictive for practicality. We would like to see the boundary measurements removed. It should still be possible to burn on the boundary with 'Best Practical Option' and not affect the immediate neighbour.

Remove Rules 7.10.2; 7.10.3; 7.10.4; 7.10.6; 7.10.8

Replace with 'Best Practical Option' as defined in your Definitions.

Rule 7.67 – pge 7-21. Regarding Odour.

As travellers approach Canterbury plains by car from other regions they can 'smell' the success of the Dairy Industry. One significant factor in the production of objectionable odour relates directly to the ratio of cows to land area. The greater the ratio of cows to land area means increased issues for effluent disposal likely to cause odour.

We have seen efforts to restrict ratios of pigs and poultry to land area in order to minimise the effects of intensive management of these animals and birds. It does appear there is a need to address the issue of farmers' continually increasing stock numbers on dairy farms while the 'community' absorbs the environmental costs, including putting up with odours (and dust via Milk Tankers).

We see little difference in 'intensive' animal management systems between pigs, cows and any other animals. We suggest that there should be introduced a criteria established for 'factory farming'.

The criteria could be based on the ability of the area of land to sustain a number of animals according to the nutritional requirements of the animals, and the ability of the land to cope with the effluent of the animals.

We see it imperative that there is some limitation to the cow numbers and growth of dairying in Canterbury as it is easier to prevent environmental degradation than to correct any issues that may occur in the future.

Whilst we appreciate the rural environment and there are odours that do accompany the farming of animals. It would be fair to suggest that a 'sustainable' dairy farm is one where the nutritional needs of animals were met by 'on farm' production of animal food. Then the issues of effluent disposal (thus odour producing activity) is minimised.

We would anticipate that at least 75% of the nutritional needs of animals to be provided from the production of the area they are farmed. Supplementary food from other sources is only required in an emergency.

Include a Definition for factory farming of Cattle/Cows to establish a maximum stocking rate, to control the environmental effects including Odour.

Regarding Dust.

Rural areas have a considerable number of unsealed roads. The expense to seal these roads would be a cost to the community that the community would find difficulty in justifying. It is to be expected that many of the unsealed roads will be maintained as unsealed roads well into the future. In most cases there are considerable dust issues associated with these roads.

We alert Environment Canterbury of the issue of dust on the many public roads and consider it is unreasonable to expect landowners to mitigate 'dust events' on private land while the unsealed roads present a source of dust on a daily basis.

In most cases if residents have taken up the 'dust nuisance from unsealed roads' with respective District Councils, there is usually an 'unsatisfactory response' from the District Council that is likely to result in a reduction of the dust.

Do Councils have a 'Dust Monitoring Program'?

Would such a program actually result in a reduction in the dust emitted from a road?

Create a Rule under 7.6 to cover Dust Emissions from Public Roads.

Thank you

Roger Bray,
No 1 RD,
Ashburton 7771.