

From: [ECInfo](#)
To: [Mailroom Mailbox](#)
Subject: FW: Submissions on pCARP EMAIL:03161630
Date: Wednesday, 29 April 2015 4:47:26 p.m.
Attachments: [{cidB43853439601164CA033AE0842238E6B@apcprd01.prod.exchangelabs.com}\vps_3299955100834107361.pdf](#)
[{cidF20A39BED05A85468997C0756B84FB59@apcprd01.prod.exchangelabs.com}\ATT00001.txt](#)
[{cid8DB258A393DD804D942676FB77CB1CB1@apcprd01.prod.exchangelabs.com}\PastedGraphic-5.tiff](#)
[{cid5FD101D260534C41A4BB4F3CA364B7FC@apcprd01.prod.exchangelabs.com}\ATT00002.txt](#)
Importance: Low

Hi Mailroom,

Can you please TRIM and workflow this submission?

Thanks

Charles

----- Original Message -----

From: Hooper Kathryn
Received: 29/04/2015 1:41 p.m.
To: ECInfo; Environment Canterbury; Services Customer; Services Customer
Cc: Cunningham Tony Neil
Subject: Submissions on pCARP

Dear Ecan,

As per discussions with Kimberley (thank you for your help Kimberley!), attached is a submission from myself of Landpro, on behalf of our client Cavalier Woolscourers Ltd as downloaded from the Online Submission Portal. We were unable to submit these online due to technical difficulties, hence the email to you (good luck sorting out the system!). The attachment says 'draft' as this is the default when downloading them, however please accept these as final.

If you have any questions, please feel welcome to contact me,

Yours sincerely,
Kathryn Hooper

Submissions

Proposed Canterbury Air Regional Plan (28/02/15 to 1/05/15)

Submission by	Landpro Ltd on Behalf of Cavalier Woolscourers Ltd (Ms Kathryn Hooper)
Submission ID	pCARP-
Response Date	19/04/15 9:48 AM
Consultation Point	6.20 Paragraph (View)
Status	Draft
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that:

- . Support
- . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

The application of BPO is in principle supported, however the concern is that this will result in increasingly stringent technology requirements being applied to existing boilers in Clean Air zones, particularly at times when the consent holder seeks to renew or modify existing consents, or when new consents are sought for new activities on an existing site.

From the point of view of the Washdyke airshed and the Timaru District, new industry and expansion of existing industry is encouraged and contributes to the social and economic wellbeing of the District. Providing investor certainty is therefore paramount: will investors seek to invest in new facilities, and/or expand existing facilities if they are not certain how much the BPO will cost them in the future?

Cavalier Woolscourers is in the process of applying for air discharge consent for a small increase in capacity to its existing Washdyke wool scouring plant. The emissions from the site will be improved on the current situation, with the retirement of two old coal-fired boilers, and the expanded site will provide more jobs. While the final consent conditions are yet to be seen, this process has already highlighted that there is strong potential for well intentioned, and/or onerous conditions which have a small environmental benefit yet come at a large cost to the applicant to be imposed.

We would be happy to discuss this in more detail with ECAN if you would like to examine the full details on the financial implications of the conditions that are imposed (for the consent holder, and also downstream suppliers - for example coal suppliers having to deliver low sulphur coal).

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Certainty that the BPO assessment will be applied fairly and reasonably. It is envisaged that this will require investigation into and presentation of options for ensuring this can occur with more certainty for those who have made or who are planning to make significant investment in infrastructure which is reliant on the burning of coal.

Investment made in existing infrastructure and the difficulties and costs associated with retrofitting new technology to existing infrastructure should be specifically recognised in ECan Policies.

If so

Submission by	Landpro Ltd on Behalf of Cavalier Woolscourers Ltd (Ms Kathryn Hooper)
Submission ID	pCARP-
Response Date	27/04/15 1:58 PM
Consultation Point	13 MANDATORY INFORMATION (View)
Status	Draft
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that:

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

To Be Heard

Please select the appropriate option from the following: I DO wish to be heard in support of my submission;

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

Submission by	Landpro Ltd on Behalf of Cavalier Woolscourers Ltd (Ms Kathryn Hooper)
Submission ID	pCARP-
Response Date	28/04/15 1:42 PM

Consultation Point 6.8 Paragraph ([_View](#))
Status Draft
Submission Type Web
Version 0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Support

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

This is supported as it gives investors more certainty when they set up a new plant, or make expansions to an existing plant in an appropriate location (e.g. industrial zones).

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Retain this provision.

If so

Submission by Landpro Ltd on Behalf of Cavalier Woolscourers Ltd
(Ms Kathryn Hooper)
Submission ID pCARP-
Response Date 28/04/15 1:53 PM
Consultation Point 6.7 Paragraph ([_View](#))
Status Draft
Submission Type Web
Version 0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Support
. Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

This clause is neither supported nor opposed, however it is noted that there have been circumstances whereby activities which stand to be affected by a policy such as this (i.e. which have to reduce effects or relocate when essentially encroached upon) have not been notified or made aware about changes to land use (e.g. land rezoning, subdivision) during the District/City Council consenting process. Parties who may be in a position where their activities will be affected by this policy need the confidence of a

robust mechanism whereby they will be identified and consulted with, and given the opportunity to object to, proposals to change land use.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

It is sought that the mechanism whereby lawfully established activities which may be affected by this policy be clearly identified, its robustness demonstrated, and remedies should this process fail (i.e. land use change is authorised without input from the affected party) be clearly spelt out.

If so

Kathryn Hooper

Director



LANDPRO

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