

**From:** [Emily Buckingham](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Mark North \(FB\)](#); [Mark St Clair](#)  
**Subject:** Submission - Proposed Canterbury Air Regional Plan  
**Date:** Thursday, 30 April 2015 9:08:11 a.m.  
**Attachments:** [Fletcher Building submission - Canterbury Air Plan.pdf](#)

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Dear whom it may concern,

Please find attached Fletcher Building Ltd's submission on the Proposed Canterbury Air Regional Plan.

Please confirm receipt.

Kind regards,

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**SUBMISSION ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR REGIONAL PLAN UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

**TO:** Freepost 1201  
Proposed Canterbury Air Regional Plan  
Environment Canterbury  
PO Box 345  
CHRISTCHURCH 8140

**Name:** Fletcher Building Limited  
Private Bag 92 114  
Auckland 1142

**Address for service:** Hill Young Cooper Limited  
P O Box 8092  
The Terrace  
WELLINGTON 6143

Attention: Mark St Clair

Phone: (04) 473 5310  
E-mail: m.stclair@hyc.co.nz

**This is a submission on the Proposed Canterbury Air Regional Plan**

- 1. The specific provisions of the Proposed Policy Statement and Proposed Plan Change that this submission relates to are as follows:**

Multiple provisions - see attached table.

- 2. The specific reason for Fletcher Building Limited's submission is as follows:**

See attached table.

- 3. Fletcher Building Limited seeks the following decisions from Environment Canterbury:**

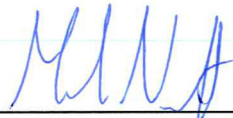
That Environment Canterbury **reject (in part)** and adopt changes into the provisions of the proposed plan. See attached table for further details of specific decisions sought.

- 4. Fletcher Building Limited confirms that it could not gain an advantage in trade competition through this submission.**

5. Fletcher Building Limited does wish to be heard in support of its submission.
6. If others make a similar submission, Fletcher Building Limited would be prepared to consider presenting a joint case with them at any hearing.

**DATED**

29/4/15



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on behalf of Fletcher Building Limited

**Address for service:**

Hill Young Cooper Limited  
P O Box 8092  
The Terrace  
WELLINGTON 6143

Attention: Mark St Clair

Phone: (04) 473 5310

## Fletcher Building Limited's (FB) submission

**Introduction:** Fletcher Building has 14 manufacturing sites in the Canterbury Region operating under different divisions. One of these sites is Winstone Wallboards, Opawa Road in Christchurch, which has made a separate submission on this plan. The other sites, Firth, Humes and Iplex, manufacture concrete, masonry products and pipeline systems.

Fletcher Building's submission is set out in the table below.

Specific provisions	Submission and reasons	Decision sought
<b>Objectives</b>		
Objective 5.8	<p><i>It is recognised that air quality expectations throughout the Region differ depending on location and the characteristics of the receiving environment.</i></p> <p>This objective recognises at a high level that it is acceptable for industrial areas to potentially have lower air quality than other locations.</p>	<b>Retain</b> Objective 5.8.
Objective 5.9	<p><i>Activities are spatially located so that they result in appropriate air quality outcomes being achieved both at present and in the future.</i></p> <p>The intent of the reference to appropriate air quality outcomes being achieved in 'the future' appears to link to Policy 6.7, which compels air discharging activities to relocate or reduce discharges if other sensitive activities move into the vicinity (a policy that FB opposes, as set out below).</p> <p>While spatial location may be a more relevant consideration for newly establishing activities, it is unreasonable for long-established air discharging activities to be disadvantaged by the sensitivities of other activities that have not been established at the time of renewing their permits, especially if they are located in industrial zones.</p> <p>Also, it may not be appropriate for the Air Plan to contain an objective about the spatial location of activities, as this will be largely determined by the district plans. Policy 6.6 is more appropriate in this respect.</p>	<b>Delete</b> Objective 5.9.

Specific provisions	Submission and reasons	Decision sought
<b>Policies</b>		
Policies 6.2, 6.3 and 6.21	Policies 6.2, 6.3 and 6.21 talk about meeting the 2002 Ambient Air Quality Guideline (AAQG) values. It is more appropriate to meet the National Environmental Standard (NES) values, as this is a statutory document which may be updated in the future to differ from the AAQG (making these policies out of date). It is noted that the AAQG does contains values for pollutants not covered by the NES. If the council wishes to meet these, the policies could be worded to reflect this.	<b>Delete</b> reference in Policies 6.2, 6.3 and 6.21 to the 2002 Ambient Air Quality Guidelines values and <b>replace</b> with NES Standards, <b>or</b> refer to the NES as well as any values in the AAQG that are not covered by the NES.
Policy 6.4	<p><i>Reduce overall concentrations of PM<sub>2.5</sub> in clean air zones so that by 2030 PM<sub>2.5</sub> concentrations do not exceed 25µg/m<sup>3</sup> (24 hour average), while providing for industrial growth.</i></p> <p>FB supports the intent of this policy to provide for industrial growth while reducing overall concentrations of particulate, because the greatest sources of particulate are vehicles and home heating, and these should be targeted for reducing particulate emissions. Industries should not be unduly penalised by the pollution largely caused by other activities when redeveloping a site or newly establishing. This policy recognises that industrial growth promotes economic wellbeing.</p> <p>However FB notes that this policy specifically refers to PM<sub>2.5</sub> concentrations. PM<sub>10</sub> is the more commonly measured contaminant, and there is much more information currently available on PM<sub>10</sub>. If the council wishes to set PM<sub>2.5</sub> limits, it should monitor current concentrations of PM<sub>2.5</sub> so that the impact of the policy can be understood. Without this understanding, and in the absence of any rule relating to PM<sub>2.5</sub>, FB does not support the policy being included.</p>	<p><b>Delete</b> Policy 6.4.</p> <p><i>Note: If policy is not deleted, FB supports retention of the text 'while providing for industrial growth'.</i></p>

Specific provisions	Submission and reasons	Decision sought
Policy 6.6	<p><i>Discharges of contaminants into air, and the effects of those discharges, occur in appropriate locations, taking into account the distribution of land use as provided for by the relevant district plan.</i></p> <p>This policy is supported as it recognises the role that the district plans have in determining the locations of land use activities. There are limited zones which are suitable for many air discharging activities, so if an activity is in the correct zone the air discharges from that activity should be generally enabled.</p>	<b><u>Retain</u></b> Policy 6.6.
Policy 6.7	<p><i>Where, as a result of authorised land use change, land use activities within the neighbourhood of a discharge into air are significantly adversely affected by that discharge, it is anticipated that within a defined time frame the activity giving rise to the discharge will reduce effects or relocate.</i></p> <p>FB is concerned that this policy creates uncertainty for the long term viability of its sites, as although they are currently in appropriate locations, surrounding land use changes are not within FB's control.</p> <p>Industrial activities have a right to expect that, if they locate in appropriate zones, they will be able to continue operating on that site into the future. Industries need certainty in order to continue to invest in their sites and plant. Relocating a site can significantly impact business finances and viability, and there is limited availability of suitable sites for land intensive industries. Industries should therefore be protected from reverse sensitivity effects. This is in the interests of the economic wellbeing of the region.</p>	<b><u>Delete</u></b> Policy 6.7.

Specific provisions	Submission and reasons	Decision sought
Policy 6.8	<p><i>Where activities that discharge into air locate appropriately to avoid the potential for reverse sensitivity effects, then longer consent duration may be available to provide ongoing operational certainty.</i></p> <p>FB supports the intent of the policy. However this policy does not recognise that there are existing activities that discharge into air which were appropriately located at the time that they established, but other uses have established over time, creating the potential for reverse sensitivity effects. Because of the wording, such activities may not be considered 'located appropriately' under this policy. These activities also need ongoing operational certainty.</p>	<p><b>Amend</b> Policy 6.8 to encompass all air discharging activities that have located in appropriate zones. E.g.</p> <p><i>Where activities that discharge into air locate appropriately to <del>avoid the potential for reverse sensitivity effects,</del> then longer consent duration may be available to provide ongoing operational certainty.</i></p>
Policy 6.19	<p><i>Enable discharges of contaminants into air associated with large scale, industrial and trade activities and nationally and regionally significant infrastructure, in locations where the discharge is compatible with the surrounding land use pattern and while ensuring that adverse effects on air quality are minimised.</i></p> <p>FB supports the intent to enable discharges associated with large scale, industrial and trade activities as this supports the ongoing operation of such activities and the economic benefits they provide for.</p>	<p><b>Retain</b> Policy 6.19.</p>
Policy 6.22	<p><i>Within Clean Air Zones, significant increases of PM<sub>10</sub> concentrations from discharges of contaminants are to be offset in accordance with the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.</i></p> <p>FB recognises that this policy is required in order to give effect to the NES.</p>	<p><b>Retain</b> Policy 6.22.</p>

Specific provisions	Submission and reasons	Decision sought
Rules		
<p>Rule 7.14 - Discharge of PM<sub>10</sub> in a Clear Air Zone</p>	<p><i>Within a Clean Air Zone, the discharge of PM<sub>10</sub> into air from a large scale burning device, where concentrations of PM<sub>10</sub> will likely equal or exceed 2.5µg/m<sup>3</sup> at ground level at or beyond the boundary of the property of origin, is a restricted discretionary activity provided the following condition is met:</i></p> <p><i>1. 100% of the discharge will be off-set within the gazetted air shed in accordance with Regulation 17 of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.</i></p> <p><i>The exercise of discretion is restricted to the following matters:</i></p> <p><i>1. The proposal to off-set 100% of the emissions within the gazetted airshed to ensure that there is no net increase of PM<sub>10</sub> emissions; and</i></p> <p><i>2. The matters set out in rule 7.2.</i></p> <p>FB assumes that this rule may have been intended to implement Regulation 17 of the NES, however the way in which it is worded makes it much stricter than the NES. Regulation 17 refers to <u>increasing</u> the existing offsite concentrations of PM<sub>10</sub> by 2.5µg/m<sup>3</sup>. This rule appears to just refer to the offsite concentrations <u>being</u> 2.5µg/m<sup>3</sup> as the trigger for the rule. Regulation 17 also allows for existing consented air discharging activities to renew their consents for the same activity without the offsetting requirement applying, if the PM<sub>10</sub> emissions are the same or less than the previously consented activity. This rule contains no such exclusion.</p> <p>This rule would potentially shut down many existing air discharging industrial sites upon consent renewal.</p>	<p><b>Amend</b> Rule 7.14 to implement the NES accurately and be no stricter than the NES. Either refer directly to Regulation 17 of the NES, or improve the rule wording e.g.</p> <p><i>Within a Clean Air Zone, the discharge of PM<sub>10</sub> into air from a large scale burning device, where <u>existing</u> concentrations of PM<sub>10</sub> <del>will likely equal or exceed 2.5µg/m<sup>3</sup></del> at ground level at or beyond the boundary of the property of origin <u>will likely be increased by 2.5µg/m<sup>3</sup> or more</u>, is a restricted discretionary activity provided the following condition is met: ...</i></p> <p><i><u>Note: in the case of existing activities renewing their consents, this rule only applies if the proposed activity increases off site levels of PM<sub>10</sub> by 2.5µg/m<sup>3</sup> or more above the previously consented level.</u></i></p>



Specific provisions	Submission and reasons	Decision sought
<p>Rule 7.18 - Industrial, trade and large scale discharges to air</p>	<p><i>The discharge of contaminants into air from a large scale fuel burning device or from an industrial or trade premise established either: inside a Clean Air Zone; or outside a Clean Air Zone after 28 February 2015, that will likely result in guideline values, set out in the Ambient Air Quality Guidelines 2002 Update, being exceeded is a prohibited activity.</i></p> <p>Rule 7.18 should refer to the NES rather than the AAQG, which already contains these prohibitions and is a statutory document that will be updated in future.</p>	<p><b>Delete</b> reference to the 2002 Ambient Air Quality Guidelines values and replace with NES Standards.</p>
<p>Rule 7.19 - External combustion - Gas</p>	<p><i>7.19 The discharge of contaminants into air from the combustion of liquefied petroleum gas or compressed natural gas in any large scale external combustion device with a net energy output of less than or equal to 5MW is a permitted activity provided the following conditions are met: ...</i></p> <p><i>3. There are no buildings higher than five metres above natural ground level within a 25m radius of the emission stack, unless the building, land or other structure is on a different property to the stack and was not established or anticipated at the time the stack was established; and ...</i></p> <p>As Rule 7.19 is worded, it appears to apply the 5MW output limit to each device (not per site). FB supports this, as it would promote the ability of industrial sites to achieve permitted status. It is also fairer for larger sites with devices spaced across the site that these devices be individually assessed.</p> <p>FB notes that under the operative Natural Resources Regional Plan, a site can have up to 20MW output as a controlled activity. Under this proposed plan, external combustion of gas not meeting Rule 7.19 becomes a discretionary activity. FB considers that having a 5MW limit per device would help sites to avoid discretionary status. If the 5MW limit was applied to sites as a whole it would make many sites discretionary; this is overly onerous considering the clean burning properties of gas.</p> <p>Condition 3 of Rule 7.19 will likely affect many existing sites. Both condition 3 and condition 5 of the rule control stacks in relation to building heights on the site. FB believes that condition 5 alone is sufficient to address the effects of buildings on dispersion from a stack. Condition 5 is more appropriate as it takes into account the height of the stack compared to the height of the building, and is more effects based, whereas under condition 3, building heights are limited no matter what the height of the stack.</p>	<p><b>Retain</b> the wording of the first paragraph of Rule 7.19 in full.</p> <p><i>Note: If this is amended to refer to 5MW on any site, FB would oppose this and would seek an increased threshold for gas combustion (e.g. up to 20MW as controlled) before it falls to a discretionary activity status.</i></p> <p><b>Delete</b> condition 3 of Rule 7.19.</p> <p><i>Note: if this condition is retained, FB does not consider that the default discretionary activity status is appropriate for sites that do have 5m+ high buildings within 25m of a stack, and would seek a new controlled/restricted discretionary activity rule for external combustion of gas that does not meet condition 3.</i></p>

Specific provisions	Submission and reasons	Decision sought
<p>Rule 7.20 - External combustion - Diesel</p>	<p><i>7.20 The discharge of contaminants into air from the combustion of diesel in any large scale external combustion device with a net energy output of less than or equal to:</i></p> <ol style="list-style-type: none"> <li><i>1. 500kW within a Clean Air Zone; or</i></li> <li><i>2. 2MW outside a Clean air Zone</i></li> </ol> <p><i>is a permitted activity provided the following conditions are met:</i></p> <p>...</p> <ol style="list-style-type: none"> <li><i>4. There are no buildings higher than five metres above natural ground level within a 25m radius of the emission stack, unless the building, land or other structure is on a different property to the stack and was not established or anticipated at the time the stack was established; and</i></li> <li><i>5. The land within a 25m radius of the emission stack does not vary in elevation by more than 0.5m above or below natural ground level at the base of the emission stack; and</i></li> </ol> <p>...</p> <p>Both conditions 4 and 5 are not sufficiently related to the effects that council should be trying to control, and would make many sites discretionary activities with little justification. As per FB's comments on Rule 7.19 above, the aim should be to address any effects tall buildings have on dispersion from a stack. The key aspect to this is the height difference between buildings and the stack - and this is what any condition should relate to. Condition 5 would trigger consent for sites that are not flat, no matter what the height of the stack, and is particularly unreasonable.</p>	<p><b>Delete</b> conditions 4 and 5 of Rule 7.20.</p> <p><b>Replace</b> with a condition for stacks to be at least 3m above the ridgeline of any building within 25m of the stack.</p>

Specific provisions	Submission and reasons	Decision sought
Rule 7.24 - Internal combustion	<p><i>The discharge of contaminants into air, for the purpose of emergency electricity generation, maintenance and peak electricity network load management, from the combustion of diesel, petrol, liquefied petroleum gas or compressed natural gas in any stationary large scale internal combustion device with a net energy output capacity up to and including 300kW is a permitted activity provided the following conditions are met: ...</i></p> <p>FB supports provisions for the use of smaller scale combustion devices of 300kW for emergency electricity generation as a permitted activity. The ability to use such devices is important for site contingency planning.</p> <p>There is an issue with condition 3 which specifies a maximum sulphur content of 0.001%. While this is appropriate for diesel, the maximum allowable sulphur content of petrol in the New Zealand Fuel specifications is 0.005%. Therefore FB recommends that the condition is changed to avoid small internal combustion devices becoming discretionary activities.</p>	<p><b>Amend</b> condition 3 of Rule 7.24 as follows:</p> <p><i>The sulphur content of the diesel burnt does not exceed 0.001% by weight ,and the sulphur content of the petrol burnt does not exceed 0.005% by weight.</i></p>
Rule 7.25 - Internal combustion	<p><i>The discharge of contaminants into air, for the purpose of emergency electricity generation, maintenance and peak electricity network load management, from the combustion of diesel, petrol, liquefied petroleum gas or compressed natural gas in any stationary large scale internal combustion device with a net energy output of:</i></p> <ol style="list-style-type: none"> <li><i>1. 301kW to 1MW within a Clean Air Zone; or</i></li> <li><i>2. 301kW to 2MW outside a Clean Air Zone</i></li> </ol> <p><i>is a controlled activity provided the following conditions are met:...</i></p> <p>FB supports provisions for the use of combustion devices 301kW - 1MW/2MW for emergency electricity generation as a controlled activity. The ability to use such devices is important for site contingency planning.</p> <p>There is the same issue as above with respect to the sulphur content of petrol and therefore the same relief is sought.</p>	<p><b>Amend</b> condition 3 of Rule 7.25 as follows:</p> <p><i>The sulphur content of the diesel burnt does not exceed 0.001% by weight ,and the sulphur content of the petrol burnt does not exceed 0.005% by weight.</i></p>

Specific provisions	Submission and reasons	Decision sought
<p>Rule 7.27 - Combustion discharges not complying with or provided for by other rules</p>	<p><i>Any discharge of contaminants into air from any large scale fuel burning device that does not comply with the appropriate permitted activity rule and conditions, and is not prohibited, and is not otherwise provided for by rules 7.3, 7.4 or rules 7.19-7.26 is a discretionary activity.</i></p> <p>This default discretionary activity status for activities not covered by another rule applies to a greater range of activities than under the operative Natural Resources Regional Plan rules. As discussed above, a particular concern is that this rule applies to any external combustion of gas not meeting Rule 7.19, including combustion with over 5MW output, and any existing stacks where there is a building over 5m high within a 25m radius.</p> <p>Another particular concern is that this rule applies to any external combustion of diesel not meeting Rule 7.20, i.e. any combustion over 500kW output, any stack where there is a building over 5m high within a 25m radius, or any stack where the site is not flat within the vicinity of the stack.</p>	<p>Relief sought is dependent upon what happens to Rule 7.19 and Rule 7.20, but options may include:</p> <p><b>Add new rule</b> covering external combustion of gas up to 20MW as a controlled activity,  <b>or add new rule</b> for external combustion of gas that does not meet condition 3 of Rule 7.19 as a controlled/restricted discretionary activity</p>
<p>Rule 7.29 - Dust from industrial or trade premise</p>	<p><i>Except where otherwise permitted or prohibited by rules 7.30 to 7.59 below, the discharge of dust, beyond the boundary of the property of origin, including from unsealed or unconsolidated surfaces, from an industrial or trade premise, including a construction, subdivision or development property is a restricted discretionary activity.</i></p> <p>This rule requires that the discharge of <u>any</u> dust beyond the boundary of the property of origin be consented as a restricted discretionary activity regardless of the amount of dust and whether it is frequent, objectionable, offensive or a nuisance. This rule is impractical and unjustified in terms of the magnitude of effects.</p>	<p>Amend rule so that the discharge of dust from industrial and trade premises is a permitted activity subject to no objectionable / nuisance effects occurring beyond the boundary of the site.</p>

Specific provisions	Submission and reasons	Decision sought
<p>Rule 7.34 - Storage or transfer of petroleum products</p>	<p><i>The discharge of contaminants into air from the storage or transfer of petroleum products, including vapour ventilation and displacement, is a permitted activity provided the following conditions are met:</i></p> <p>...</p> <p><i>2. If there is a discharge of odour or dust beyond the boundary of the property of origin, an odour and/or dust management plan prepared in accordance with Schedule 2 must be held and implemented by the persons responsible for the discharge into air; and ...</i></p> <p>FB considers that this rule is too vague on when an odour/dust management plan is required. The rule could potentially apply to small scale volumes of petroleum product transferred and stored on sites. It would be preferable for the rule to exclude smaller volumes of petroleum product from requiring a management plan.</p>	<p><b>Split rule into two new rules:</b></p> <p>1) that the discharge of contaminants to air from the storage or transfer of petroleum products less than [1000L] is permitted (subject to no conditions); and</p> <p>2) that the discharge of contaminants to air from the storage or transfer of petroleum products [1000L] or more is permitted subject to the conditions 1-3 as per the notified rule.</p>
<p>Rule 7.37 - Handling of bulk solid materials</p>	<p><i>The discharge of contaminants into air from the handling of bulk solid materials is a permitted activity provided the following conditions are met: ...</i></p> <p><i>6. The discharge does not occur within 200m of a sensitive activity, wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu.</i></p> <p>It is undesirable to have consent activity status linked to distance from a sensitive activity, wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu when it does not appear that information on the locations of such sites is easily available and they are not shown on the plan maps. This is a permitted activity rule, so there is no trigger for information on the activity to be provided to Ngāi Tahu in order for them to determine proximity to these sites. The section 32 report does not identify bulk solid materials provisions as being associated with the protection of cultural sites from adverse effects.</p> <p>It is unclear to a reader what 'bulk solid materials' refers to, as this is not a commonly used term and has no definition in the plan.</p>	<p>1. <b>Add</b> a definition for 'bulk solid materials'</p> <p>2. <b>Map</b> the sensitive activities, sites of significance so that the impact of the rule can be assessed and consent status can be determined by external parties, or <b>delete</b> condition 6.</p>

Specific provisions	Submission and reasons	Decision sought
Rule 7.38 - Outdoor storage of bulk solid materials	<p><i>The discharge of contaminants into air from the outdoor storage of bulk solid materials is a permitted activity provided the following conditions are met: ...</i></p> <p><i>5. The discharge does not occur within 100m of a sensitive activity, wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu.</i></p> <p>Same submission and reasons as Rule 7.37 above.</p>	<p>1. <b>Add</b> a definition for 'bulk solid materials'</p> <p>2. <b>Map</b> the sensitive activities, sites of significance so that the impact of the rule can be assessed and consent status can be determined by external parties, or <b>delete</b> condition 5.</p>
Schedule 2 - Assessment of offensive and objectionable effects (Contents of dust, odour and smoke management plans)	<p>Page 8-17: In paragraph 3 it states that the level of detail in a dust/odour/smoke management plan is relative to the scale of the discharge and the likelihood of the effect being offensive or objectionable. However some of the requirements in numbers 1-8 are very detailed and will not be required in all cases. It would be better to simplify the requirements or list them as guidance rather than stating that the management plan 'must include' these items.</p>	<p><b>Replace</b> 'contents of dust, odour and smoke management plans' items 1-8 with broader requirements, e.g. a management plan is to include:</p> <ul style="list-style-type: none"> <li>• A description of the activity</li> <li>• A description of the potential emissions</li> <li>• A description of the mitigation measures</li> <li>• Contingency measures</li> <li>• Maintenance requirements</li> <li>• Monitoring requirements.</li> </ul>

Specific provisions	Submission and reasons	Decision sought
Schedule 6 - Testing for particulate matter in exhaust gases	Undertaking particulate monitoring in accordance with Schedule 6 may be problematic on stacks which are saturated, including any wet scrubbers. Schedule 6 needs to provide dispensation for this.	<p><b>Amend</b> Schedule 6 to make dispensation for the measurement of PM<sub>10</sub> in saturated stacks as follows:</p> <p><i>For saturated stacks the sampling method shall be agreed with Environment Canterbury prior to sampling.</i></p>