

From: [ECInfo](#)
To: [Mailroom Mailbox](#)
Subject: FW: SUBMISSION - PROPOSED CANTERBURY AIR REGIONAL PLAN EMAIL:06110061
Date: Thursday, 30 April 2015 2:16:41 p.m.
Attachments: [{cid:A9A03908510D5443AA0C6FDFDA4DE227@ecan.govt.nz}Ecan - proposed submission Canty Air Regional plan.pdf](#)
Importance: High

Hi Team

Can you please TRIM and workflow this submission.

Thanks

Kiri

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

From: Rhind Graeme
Received: 30/04/2015 1:50 p.m.
To: ECInfo; Environment Canterbury; Services Customer; Services Customer
Subject: SUBMISSION - PROPOSED CANTERBURY AIR REGIONAL PLAN

To Whom It May Concern

Please find attached submission for the above subject.

Sincerely

Graeme Rhind
Chief Operating Officer NZ
Bledisloe New Zealand Ltd
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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: GRAEME JOHN RHIND

Phone (Hm): (03) 356 0136

Organisation*: BLDISLOE NZ LTD

Phone (Wk): (03) 379 9920

* the organisation that this submission is made on behalf of

Postal Address: 15-19 LONDON ST
CHRISTCHURCH 8013

Phone (Cell): 027 435 9685

Email: grhinda@bledisloe.co.nz

Postcode: 8013

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: Grhinda

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.

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- ☐ 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

Form 5 Air Plan Submission Form – Section C (Bledisloe N.Z. Limited)

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>
Definition of "Large scale fuel burning device", page 2-4, of the Proposed Canterbury Air Regional Plan.	I <u>support</u> the definition of "Large scale fuel burning device" as phrased including the exclusion of "2. waste incineration devices and crematoria"	Retain the definition as currently drafted
Rule 7.14, page 7-4.	I <u>oppose</u> Rule 7.14 as currently drafted. This rule should be no more stringent than regulation 17 of the NESAQ. More specifically, the wording (or at least the intent) of regulation 17(2) (a), (b), and (c) of the NESAQ should be included in this rule.	Amend Rule 7.14 to include the wording (or at least the intent) of regulation 17(2) (a), (b), and (c) of the NESAQ
Rule 7.17, page 7-4.	I <u>oppose</u> Rule 7.17 as currently drafted. This rule states that "The discharge of contaminants into air from a large scale solid fuel burning device or from an industrial or trade premise established prior to 28 February 2015, outside a Clean Air Zone, that will likely result in guideline values, set out in the Ambient Air Quality Guidelines 2002 Update, being exceeded is a non-complying activity."	How exactly the Council will assess "... that will likely result in guideline values ... being exceeded ..." should be included in the rule or in a detailed advice note to the rule.
Rule 7.18, page 7-4.	I <u>oppose</u> Rule 7.18 as currently drafted. This rule states that "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"	How exactly the Council will assess "... that will likely result in guideline values ... being exceeded ..." should be included in the rule or in a detailed advice note to the rule.
Rule 7.28, page 7-10.	I <u>support</u> Rule 7.28, which provides for the emission of odour beyond the site boundary as a restricted discretionary activity, is reasonable.	Retain the rule as currently drafted.
Rule 7.33, page 7-11.	I <u>support</u> Rule 7.33 which provides for the discharge of contaminants into air from any space heating appliance located on an industrial or trade premise as a permitted activity providing the conditions are met.	Retain the rule as currently drafted.
Rule 7.41, page 7-13.	I <u>support</u> Rule 7.4, which provides for the discharge of contaminants to air from laboratory fume cupboards as a permitted activity providing the conditions are met.	Retain the rule as currently drafted.
Rule 7.52, page 7-17.	I <u>support</u> the intent of Rule 7.52 which provides for the discharge of contaminants into air from the ventilation of buildings located on industrial or trade premises, where that discharge is not via an emission stack or treatment system and is not authorised pursuant to rules 7.28 - 7.51, as a permitted activity provided the conditions are met.	Retain the rule as currently drafted except for Condition 1.

Form 5 Air Plan Submission Form – Section C (Bledisloe N.Z. Limited)

	<p>I <u>oppose</u> Condition 1 of Rule 7.52 which states: "The discharge does not contain any air pollutant or contaminant identified in Parts 3 or 4 of Schedule 4;"</p> <p>I <u>support</u> Conditions 2, 3, 4, and 5.</p>	<p>In respect to Condition 1, there is no limit below which Schedule 4 contaminants are permitted. I request that the emission of Schedule 4 contaminants be limited to not exceeding the relevant N.Z. Workplace Exposure Standards (or, in the absence of N.Z. standards, relevant occupational standards and guidelines from other jurisdictions) at the point of any ventilation air discharge.</p>
<p>Rule 7.59, page 7-19.</p>	<p>I support Rule 7.59 which states: "Any discharge of contaminants into air from an industrial or trade premise or process 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 7.28 - 7.58 is a discretionary activity." A list of likely industrial and trade activities as examples is then provided in the Plan. They include "cremation".</p>	<p>Retain the rule as currently drafted.</p>