

From: [Kelsey Ashworth](#)
To: [Mailroom Mailbox](#)
Subject: Proposed Canterbury Air Regional Plan Submission
Date: Thursday, 30 April 2015 4:37:02 p.m.
Attachments: [Proposed Canterbury Air Regional Plan Submission.pdf](#)

Good afternoon,

Please find attached Hurunui District Council's submission on the Proposed Canterbury Air Regional Plan.

Regards

Kelsey Ashworth

Policy Planner

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Mail PO Box 13, Amberley 7441



“Making our district even better”

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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: Kelsey Ashworth Phone (Hm): —
Organisation*: Hurunui District Council. Phone (Wk): 03 314 0058
* the organisation that this submission is made on behalf of
Postal Address: PO Box 13, Amberley Phone (Cell): —
7441. Postcode: 7441.
Email: kelsey.ashworth@hurunui.govt.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: [Signature] Date: 30/04/15

(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



TO: Canterbury Regional Council

RE: Proposed Canterbury Air Regional Plan

FROM: Hurunui District Council

DATE: 30 April, 2015

Introduction

Thank you for the opportunity to provide input into the development of the Proposed Canterbury Air Regional Plan. Hurunui District Council wishes to acknowledge the extensive work undertaken by the Canterbury Regional Council to allow the Hurunui District Council to participate in the initial stages of the review and giving us the opportunity to submit feedback as part of the initial consultation process.

This submission is made by and reflects the views of the elected members of the Hurunui District Council. This submission represents a summary of Council's key views in relation to the proposed rural discharges to air provisions.

Hurunui District Council is in the process of reviewing the Hurunui District Plan. We consider it important that the Proposed Hurunui District Plan provisions are consistent with the provisions in the Proposed Canterbury Air Regional Plan. We seek to ensure that our District Plan provisions do not duplicate or conflict with the Proposed Canterbury Air Regional Plan.

Hurunui District Council supports the policy and rule framework for managing rural discharges to air and in particular the following provisions:

- **Policy 6.26 The discharge of contaminants into air associated with rural activities do not cause offensive or objectionable effects beyond the boundary of the property of origin.** (p.6-3)

Reason for submission:

We support the above policy as it ensures that there is a reduction in rural residents being affected by offensive or objectionable effects. The proposed policy is also likely to manage any reverse sensitivity effects.

Decision requested:

Retain Policy 6.26 without modification.

- **Rural discharges to air rules 7.60 – 7.69** (p.7-20 – 7-22)

Reason for submission:

The Proposed District Plan provisions have been adjusted to ensure that there are no conflicting provisions between the Proposed Canterbury Air Regional Plan and the Proposed District Plan. As a result, the Proposed District Plan does not contain any provisions which regulate to the discharge of contaminants into air from animal effluent or the establishment of new intensive farming activities within distances from sensitive activities. The Proposed Hurunui District Plan intends that the Proposed Canterbury Air Regional Plan would control these matters in the Hurunui district and the Proposed District Plan would only contain rules controlling the establishment of new dwellings or residential activities within close proximity to existing intensive farming activities or animal effluent disposal areas, so that the potential for reverse sensitivity effects are reduced.

Rural discharges to air rules 7.60 -7.65 (p. 7-20 – p. 7-21)

Intensive farming activities generate a variety of effects such as odour, noise and visual effects. Therefore it is crucial that these intensive farming activities are managed to ensure that rural amenity is protected while also allowing such farming practices to occur. We support the intensive farming rules 7.60 – 7.65 (p.7-20 – p. 7-21) and the associated setbacks which predominantly manage the effects and utilise separation as a way of mitigating effects.

Rural discharges to air rules 7.66 – 7.67 (p.7-21)

While the operative District Plan does not have any specific provisions regarding “stock holding areas” the Council recognises that farming practices are continually evolving to meet an array of needs and as a result, different options are appearing for shelter of stock, such as feed pads, herd houses, wintering and loafing barns. The intensive farming provisions have been adjusted accordingly in the proposed District Plan to recognise that such practices for sheltering of stock are included as intensive farming activities. The Council supports the 1500 metre setback from any land zoned for urban use but questions whether the 500 metre setback from the property boundary may be somewhat excessive and may limit the productive potential of the land. Given the main effect of stock holding areas, is on residential activities, as the quality of life and amenity levels of residents can be affected, it is considered that sensitive activities act as the trigger for the setback distance. To ensure that the productive potential of the land is protected, it is suggested that the setback distance be taken from where the stock holding area is situated on site to where an existing sensitivity activity is established, rather than from the property boundary.

Decision requested:

Give consideration to the 500 metre setback from the property boundary and the suggested course of action outlined, above which is for the stock holding area to be setback 500 metres from a lawfully established sensitive activity rather than from the property boundary.

Rural discharges to air rules 7.68 – 7.69 (p.7-21 – p. 7-22)

The Proposed Hurunui District Plan would control the establishment of new dwellings or residential activities within close proximity to existing animal effluent disposal areas. The Council supports rules 7.68 – 7.69 and the associated conditions that are required to be met.

Decision requested:

Retain rural discharges to air rules 7.60 – 7.69 without modification.

Conclusion

The Council supports the Proposed Canterbury Air Regional Plan and in particular, the rural discharges to air provisions. We consider that the policy and rule framework for managing rural discharges recognises that the rural environment is both a working resource for activities such as farming and a living environment for its residents and the provisions seek to balance these sometimes conflicting uses. The Proposed Canterbury Air Regional Plan provisions allow for rural activities to continue, supporting the economic, social and cultural wellbeing of the district,

subject to the appropriate management while also protecting the character and amenity values of the rural environment.