

From: [Anita Wise](#)
To: [Mailroom Mailbox](#)
Subject: Submission on Proposed Canty Air Regional Plan
Date: Friday, 1 May 2015 2:24:19 p.m.
Attachments: [Oderings Submission.pdf](#)
Importance: High

On behalf of Oderings Garden Centres



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Thank you.



ODERINGS

GARDEN CENTRES

30 April 2015

Submission to Environment Canterbury on Proposed Canterbury Air Regional Plan 2015

Oderings Nurseries Christchurch was established in 1929 and has always used coal to heat our greenhouses. Prior to the establishment of Ecan we operated under a CCC clean air license. When we had to apply for a discharge permit by Ecan we were put under excessive stress and cost by the Ecan investigating Officers. Eventually these Officers were taught by our Pollution expert Dr Terry Brady how to use their modelling devices properly during the hearing. At that time however air quality in Christchurch was a lot poorer than it is now .

I would argue that much of the poorer air quality experienced on particular days comes from car exhausts during traffic jams on damaged roads, due to our inversion layer (as seen in February on TV one news cameras from the Port Hills) and this is before the winter heating begins. It is unfair to lump industry burning on top of car pollution.

In our business in Christchurch, we employ 117 staff, this swells to 170 in spring which is our busy time.

Growing plants has a low price tag attached to them. With added competition from chain stores and other national growers eroding our market we need a low costs form of heating to remain in the market place. Coal is the most efficient fuel for heating the vast amount of greenhouses we have. Also plants lock up carbon from the air hence helping to reduce greenhouse gases.

Since our discharge to air consent was approved we have improved our greenhouses to a double skin polythene with thermal screens that further improve heating efficiency. It is not in our interest to waste energy so we keep our boilers and burners regularly maintained.

The most important part in the rules that concern Oderings is Rule 7.14 below

7.14 Within a Clean Air Zone, the discharge of PM10 into air from a large scale burning device, where concentrations of PM10 will likely equal or exceed 2.5g/m³ at ground level at or beyond the boundary of the property of origin, is a restricted discretionary activity provided the following condition is met:

1. 100% of the discharge will be off-set within the gazetted airshed in accordance with Regulation 17 of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.

The exercise of discretion is restricted to the following matters:

1. The proposal to off-set 100% of the emissions within the gazetted airshed to ensure that there is no net increase of PM10 emissions; and 2. The matters set out in rule 7.2

As it is currently written, this Rule applies to all discharges including those that are lawfully consented. We understand that the intent of the Rule is to mimic the requirements of Regulation 17 that actually applies only to increments of PM10 into a polluted airshed. This means that as currently written, all lawfully consented discharges will be required to reduce their discharge to achieve the limit of 2.5 g/m³ by way of offsets as soon as the rule comes into force.

Furthermore, Regulation 17 requires a discharger to reduce the off site effects to less than 2.5 g/m³ by way of offsets that match the difference between the exceedence and the target of 2.5 g/m³. The current rule requires 100% offset that is in conflict with the Regulation. Also, the present wording does not allow explicitly for the replacement of existing discharges with similar discharges that may result in an exceedence of the 2.5g/m³ limit but still may be able to reduce the total discharge into the airshed by significant amounts eg 50% of existing lawfully consented discharges with it comes to re-consenting,

Having read the submission from Straterra we agree with all recommendations except 14V and W.

When disaster strikes or through accidental electrical cutouts all residents in towns or cities should have a basic right to home heating such as when the earthquakes struck Christchurch. Existing wood burners should be allowed for their whole life.

Thank you for considering my Submission

Regards

A handwritten signature in blue ink, appearing to read 'Julian Odering', written in a cursive style.

Julian Odering

Director



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Submitter ID:

File No:

Submission on the Proposed Canterbury Air Regional Plan

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: Julian Russell Odering Phone (Hm): 03 3381 189
Organisation*: Oderings Nurseries chch Ltd. Phone (Wk): 03 3329 099 ext 4.
* the organisation that this submission is made on behalf of
Postal Address: 92 Stourbridge st Phone (Cell): 021 582 882
Spreydon chch. Postcode: 8024
Email: Julian @ Oderings .co .nz Fax: 03 3321 585
Contact name and postal address for service of person making submission (if different from above):
Same.

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: 1/5/15
(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

