

From: [ECInfo](#)
To: [Mailroom Mailbox](#)
Subject: FW: Submission on the proposed Canterbury Air Regional Plan brand n badcock EMAIL:03161696
Date: Friday, 1 May 2015 2:39:20 p.m.
Attachments: [{cidE368633901D37845932F4B4DCA79212E@ecan.govt.nz}SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN brand n badcock.docx](#)
Importance: Low

Hi Mailroom,

Can you please TRIM and workflow this submission?

Thanks

Charles

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

From: Brand Steven Paul

Received: 1/05/2015 2:12 p.m.

To: ECInfo; Environment Canterbury; Services Customer; Services Customer

Cc: Taylor Coal Properties Limited

Subject: Submission on the proposed Canterbury Air Regional Plan brand n badcock

Dear Sirs,

Please find attached a copy of our submission on the proposed Air Plan.

Please respond acknowledging receipt of these documents.

Regards....Barbara Badcock
03 3125266 or email

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

A

SUBMITTED BY:

SP Brand & BA Badcock
Flower Growers
59 Maindonalds Road
West Eyreton
RD5 Rangiora 7475

CONTACT:

Steve Brand

SB 30-April 2015

DATE:

30th April 2015

TRADE COMPETITION:

I could not gain an advantage in trade competition through this submission.

B

I do wish to be heard in support of my submission.

C

INDUSTRIAL, TRADE AND LARGE SCALE DISCHARGES TO AIR

<p>7.17 The discharge of contaminants into air from a large scale solid fuel burning device or from an industrial or trade premise established prior to 28.2.15, 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.</p>	<p>We OBJECT to large scale solid fuel burning devices being a non-complying activity outside of a Clean Air Zone.</p>	<p>We seek to have the Canterbury Regional Council maintain the current rules that apply to solid fuel burning devices in the areas outside the Clean Air Zones.</p>
<p>7.18 The discharge of contaminants into air from a large scale solid fuel burning device or from an industrial or trade premise established either: inside a Clean Air Zone; or outside a Clean Air Zone after 28.2.2015, that will likely result in guideline values, set out in the ambient Air Quality Guidelines 2002 Update, being exceeded is a prohibited activity.</p>	<p>We OBJECT to large scale solid fuel burning devices being a prohibited activity outside of a Clean Air Zone.</p>	<p>We seek to have the Canterbury Regional Council maintain the current rules that apply to solid fuel burning devices in the areas outside the Clean Air Zones.</p>
<p>7.19, 7.20, 7.21, 7.22, 7.23, Each of these paragraphs gives guidelines for the operation of solid fuel burners fuelled by Gas, Diesel, and Wood Pellets.</p>	<p>We OBJECT to Coal Burners not being included in these guidelines.</p>	<p>We seek to have the Canterbury Regional Council maintain the current rules that apply to solid fuel burning devices in the areas outside the Clean Air Zones.</p>

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

A

SUBMITTED BY:

SP Brand & BA Badcock
Flower Growers
59 Maindonalds Road
West Eyreton
RD5 Rangiora 7475

CONTACT:

Steve Brand

DATE:

30th April 2015

TRADE COMPETITION:

I could not gain an advantage in trade competition through this submission.

B

I do wish to be heard in support of my submission.

C

INDUSTRIAL, TRADE AND LARGE SCALE DISCHARGES TO AIR

<p>7.17 The discharge of contaminants into air from a large scale solid fuel burning device or from an industrial or trade premise established prior to 28.2.15, 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.</p>	<p>We OBJECT to large scale solid fuel burning devices being a non-complying activity outside of a Clean Air Zone.</p>	<p>We seek to have the Canterbury Regional Council maintain the current rules that apply to solid fuel burning devices in the areas outside the Clean Air Zones.</p>
<p>7.18 The discharge of contaminants into air from a large scale solid fuel burning device or from an industrial or trade premise established either: inside a Clean Air Zone; or outside a Clean Air Zone after 28.2.2015, that will likely result in guideline values, set out in the ambient Air Quality Guidelines 2002 Update, being exceeded is a prohibited activity.</p>	<p>We OBJECT to large scale solid fuel burning devices being a prohibited activity outside of a Clean Air Zone.</p>	<p>We seek to have the Canterbury Regional Council maintain the current rules that apply to solid fuel burning devices in the areas outside the Clean Air Zones.</p>
<p>7.19, 7.20, 7.21, 7.22, 7.23, Each of these paragraphs gives guidelines for the operation of solid fuel burners fuelled by Gas, Diesel, and Wood Pellets.</p>	<p>We OBJECT to Coal Burners not being included in these guidelines.</p>	<p>We seek to have the Canterbury Regional Council maintain the current rules that apply to solid fuel burning devices in the areas outside the Clean Air Zones.</p>

PROPERTY SITUATION AND DETAILS

Site	West Eyreton – North Canterbury
Distance from closest village	Oxford – 15km
Distance from closest Town	Rangiora – 20km
Distance from Closest City	Christchurch – 50km
Local demography	10 acre blocks mixed with large scale farming and some horticulture
Property Size	2 sites 16 hectare in total
Business longevity	20 years

HORTICULTURAL BUSINESS

Annual Income	\$600,000 (approx.)
Fulltime Staff	5
Part-time Staff	15
Wage Bill	\$250,000
All Year Product	Lilies, Alstromeria,
Seasonal Product	Gypsophila, Paeonies, Delphiniums, Viburnum, Others

EXISTING COAL HEATING

Number of burners	3
Kw per burner	200
Heating Fuel	Coal
Usage per day	1 Ton - \$220.00
Heater efficiency	80-85%
Heating type	Ducted hot air
Building heated	Twinskin plastic tunnelhouse-climate controlled
Coal used	Low Sulphur/Low Ash
Coal Merchant	Taylor Coal Ltd
Consent Required	NO
Currently compliant	YES – under current ECAN permitted activity and regulations

ALTERNATE HEATING COMPARISONS TO COAL

Coal	\$220 per day
Wood Pellets	\$600 per day
Diesel	\$800/900 per day
Natural Gas	Not available in our area
Electricity	\$800/900 per day

ALTERNATE HEATING COSTS TO CONVERT FROM COAL

Wood Pellets	\$90,000-100,000 for 3 heating appliances
Diesel	\$90,000-100,000 for 3 heating appliances
Natural Gas	Not available in our area
Electricity	\$120,000-150,000 for 3 heating appliances +\$80,000 Electricity line/transformer upgrade

HOW COST EFFECTIVE HEATING IMPACTS OUR BUSINESS

1. Heating is during the wintertime only. This heating provides us with the ability to produce flowers during the winter months. Without the heating we would have no income for approximately 6 months of the year. Without this production we would not be able to support our staff and our business model would collapse.
2. Without year round production we would only be able to employ staff in the summer. All of our employees have been with us for several years and we have put a lot of training into them. We have 2 employees that are fully qualified horticulturalists that we have trained under the Primary ITO apprentice training scheme. We have 2 further employees that have just completed their first year of their apprenticeship.
3. All of our staff lives within a 15km radius.

HOW INCREASES IN HEATING COSTS WILL IMPACTS OUR BUSINESS

1. The last 3-5 years have been the toughest we have experienced in this industry.
2. We are increasingly finding that we have to compete with imported product from low cost countries such as China, Malaysia, Thailand, India, and Equador. Not only do these countries have lower costs but many have government subsidies as well.
3. Increases in heating and compliance costs will potentially make growing flowers with heating unprofitable and this will destabilise our whole business.

OTHER FACTORS

1. I note in the proposed plan. It gives guidelines for chimney stack heights for wood pallets, diesel and gas. There are no guidelines for coal. Is this an omission?
2. Having operated our heating systems for up to 10 years without any complaints from neighbours or being visited by compliance officers from ECAN and operated under the current guidelines of ECAN we should be given automatic Resource Consents because of existing use.
3. We are surrounded by houses on 4 hectare blocks in a Non-Clean Air Zone that have no restrictions of what or how efficiently they use their log or multi-fuel burners. Meanwhile we under the current regulations comply with all that ECAN has required of us in the operation of our heaters.
4. Our Coal merchant has been very active in holding seminars and workshops to aid in the clean and efficient operation of our burners.
5. Within the last 12 months we have had our burners inspected by a Specialist Combustion Engineer to the view of increased efficiency and clean burner operation.
6. We are cognisant of the fact that clean efficient operation of our heating system translates into a saving in cost.
7. We also agree that clean air is important for the community at large but suggest that smoke and particulate matter comes in a large part from domestic heating and diesel vehicles.
8. We are concerned that the Regional Council will stifle industry and small business in the Canterbury region that will have a negative effect jobs and incomes.

RECOMMENDATIONS

1. Coal burners under 1 megawatt remain at Status Quo. No Resource Consent needed for coal burners of this size in a Non-Clean Air Zone on land area of greater than 3.5 hectares.