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**To:** [Mailroom Mailbox](#)  
**Cc:** [Melanie Foote](#)  
**Subject:** Canterbury Air Regional Plan  
**Date:** Friday, 1 May 2015 3:21:40 p.m.  
**Attachments:** [image003.png](#)  
[Lincoln University AQ Plan submission - Final.pdf](#)

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Please find attached a submission on the Plan from [Lincoln University](#)

Regards



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**RESOURCE MANAGEMENT ACT  
SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN**

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**TO:** Chief Executive  
Canterbury Regional Council  
PO Box 345  
Christchurch

**SUBMISSION ON:** Proposed Canterbury Air Regional Plan

**SUBMISSION BY:** Lincoln University

**SUBMITTER ADDRESS:** PO Box 85084  
Lincoln University  
Lincoln 7647

*Please note the different address for service below*

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**INTRODUCTION AND BACKGROUND**

1. This is a submission by Lincoln University in opposition to aspects of the Proposed Canterbury Air Regional Plan.
2. Lincoln University was established as a School of Agriculture in 1878 and in 1896 offered its first degree. That year it also became the Canterbury Agricultural College, later becoming a college of the University of New Zealand. When the University of New Zealand was dissolved in 1961 the college became Lincoln College, a constituent College of the University of Canterbury. The college was granted autonomous university status in 1990 as part of the major reforms of tertiary education in New Zealand.
3. Over the past twenty five years, the University has continued to develop as a nationally and internationally renowned university specialising in commerce and management, primary production, natural resources, science, engineering and social science. Lincoln University is recognised as New Zealand's specialist land-based University.
4. The University's main facilities are located on its campus in Lincoln and this houses modern teaching spaces, student services, accommodation, recreation, conferencing, consulting and research facilities/activities. In addition to this, the University conducts trials, research, demonstration and tuition on farms and other sites in the region alongside and away from the main Campus.
5. In summary, there is a significant focus on research, teaching and demonstration activities both within the main University Campus and on adjoining and nearby University controlled land, including the University's farms.
6. Further, there is significant investment underway between Lincoln University, Crown owned research entities and commercial enterprise to further develop the research capability and capacity

at Lincoln. This coalition is currently termed the Lincoln Hub and will seek to maximise the benefit to New Zealand from research infrastructure in the immediate Lincoln area.

7. In terms of its functions and responsibilities, and the importance of these as a matter of national and regional significance, the University makes the following submissions on the Plan.

#### GENERAL SUBMISSION POINT

8. Notwithstanding the specific relief sought in submissions points 1 – 4 below, Lincoln University notes that there may be other ways of achieving the desired relief.
9. Lincoln University also seeks any consequential amendments that may be required as a result of the relief sought.

#### THE SPECIFIC SUBMISSIONS

10. The specific provisions subject to the submissions relate to Rules 7.66 – 7.69.

##### Submission Point 1 – Rule 7.66

###### Submission

11. In terms of Rule 7.66(1), the 500 metre setback requirement from a property boundary and the 1500 metre setback requirement from “any land zoned for Urban Use” are considered to be overly restrictive. The Section 32 Report provides no specific explanation or justification as to how the specific setback requirements have been arrived at. In the Proposed Canterbury Air Regional Plan, “Urban” is defined as “any site or area zoned for residential, commercial or industrial activities”. The majority of Lincoln University’s Lincoln Research, Teaching and Demonstration Farms adjacent to the Lincoln Campus are located within 1500 metres of Lincoln Township, and as a result the proposed rule could inhibit future research related activities on this property.
12. Lincoln University also seeks an amendment to ensure that the setback requirements apply in relation to existing land zoned for urban use. This would avoid a situation where an existing permitted structure accommodating cattle requires an air discharge permit as a result of land subsequently being zoned for “urban use” within the required setback.
13. Lincoln University contends that the proposed restrictions do not allow flexibility of land use required to achieve the economic gains that enable wider social, cultural and environmental goals.

###### Relief Sought

14. Amend Rule 7.66 as follows:

*The discharge of contaminants into air from structures, whether enclosed or not and including stockholding areas, accommodating cattle for more than 12 hours at a time, is a permitted activity provided the following conditions are met:*

1. The structure is located at least ~~500~~250m from the property boundary and ~~1500~~m from any existing land zoned for urban use; or
2. The structure was existing on the 28th of February 2015; and
3. The number of cattle housed in that structure has not increased by more than 10% from the 28th of February 2015; and
4. A record of the number of cattle housed in that structure as at the 28th of February 2015 is provided to the CRC on request.

## Submission Point 2 – Rule 7.67

### Submission

15. Lincoln University supports the restricted discretionary activity status of Rule 7.67

### Relief Sought

16. Retain Rule 7.67

## Submission Point 3 – Rule 7.68

### Submission

17. Rule 7.68 requires the immediate preparation of an Odour Management Plan in accordance with Schedule 2. Lincoln University considers that the timing of the requirement for having an Odour Management Plan in place needs to be aligned with the timing for Farm Environment Plans under the Proposed Canterbury Land and Water Regional Plan (1 January 2017).
18. Conditions 4 and 5 detail specific requirements for pH and dissolved oxygen in liquid or slurry effluent. Lincoln University is unconvinced that there is a correlation between the specific pH and dissolved oxygen requirements and associated levels of odour, and the Section 32 Report provides no specific explanation or justification in this regard. Notwithstanding this, the way Rule 7.68 is worded, the proposed requirements for pH and dissolved oxygen would apply to raw effluent prior to any treatment which would be unworkable (i.e. the collection and storage of liquid and slurry animal effluent or solid animal effluent).
19. Condition 6 is unnecessary as it would require a duplication of record keeping that already forms part of any discharge permit (to land in circumstances where it may enter water) under the Proposed Canterbury Land and Water Regional Plan, or could form part of the information collected as part of a Farm Environment Plan/Odour Management Plan (under Condition 2).

### Relief Sought

20. Amend Rule 7.68 as follows:

*The discharge of contaminants into air from the collection, storage, treatment and application of liquid and slurry animal effluent or solid animal effluent onto production land, is a permitted activity provided the following conditions are met:*

- 1. The discharge does not cause a noxious or dangerous effect; and*
- 2. From 1 January 2017, An odour management plan prepared in accordance with Schedule 2 is held by the persons responsible for the discharge, and where a Farm Environment Plan is required pursuant to Rule 5.45 of the Land and Water Regional Plan, the odour management plan will be a component of that Plan; and*
- 3. The odour management plan is supplied to the CRC on request; and*
- 4. The pH range of the liquid or slurry effluent is between pH6.5 and pH8; and*
- 5. Dissolved oxygen is present in liquid or slurry effluent at concentrations greater than 1ppm; and*
- 6. The persons responsible for the effluent application will keep a record for 3 months, to be provided to the CRC on request, of the effluent discharged including the following information:*
  - (a) the type of effluent applied to land; and*
  - (b) the estimated daily quantity of effluent applied to land in cubic metres; and*

~~(c) the location of the effluent application; and  
(d) the wind direction at the time of application.~~

**Submission Point 4 – Rule 7.69**

Submission

21. Lincoln University supports the restricted discretionary activity status of Rule 7.69.

Relief Sought

22. Retain Rule 7.69

**HEARING**

23. Lincoln University wishes to be heard in support of its submission. If others make similar submissions, the University may be prepared to consider presenting a joint case with them at any hearing.

SIGNED for and on behalf of  
Lincoln University



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Darryl Millar  
Authorised agent for and on behalf of Lincoln University

Dated: 30 April 2015

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