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To: [Mailroom Mailbox](#)
Cc: [Nick Daniels](#); "[Coxhead, JohnD](#)"; [Elaine Chapman](#); [Brian Thom](#)
Subject: AgResearch Submission - Proposed Canterbury Air Regional Plan
Date: Friday, 1 May 2015 3:34:55 p.m.
Attachments: [AqResearch Submission - Proposed Canterbury Air Regional Plan \(Final 010515\).pdf](#)

Dear Sir/Madam

On behalf of my client AgResearch Ltd, please find attached a submission in relation to the Proposed Canterbury Air Regional Plan.

Please contact me with any comments or queries.

Regards - Graeme

Graeme Mathieson | Environmental Consultant | Environmental Management Services

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**SUBMISSION TO
CANTERBURY REGIONAL COUNCIL
ON THE
PROPOSED CANTERBURY AIR REGIONAL PLAN
FROM
AGRESEARCH LTD**

1 MAY 2015

**SUBMISSION BY AGRESEARCH LTD ON THE
PROPOSED CANTERBURY AIR REGIONAL PLAN**

To: Chief Executive
Canterbury Regional Council
PO Box 345
CHRISTCHURCH

Email: mailroom@ecan.govt.nz

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AgResearch Ltd (“AgResearch”) wishes to be heard in support of this submission.

If others make a similar submission, AgResearch would be prepared to consider preparing a joint case with them at any hearing.

1.0 INTRODUCTION

AgResearch is New Zealand's largest Crown Research Institute ("CRI") with four Agricultural Research Campuses and 11 Agricultural Research Farms, employing about 750 staff nationwide. Formerly known as the New Zealand Pastoral Agriculture Research Institute Limited, it was created as a CRI in 1992 out of the research arm of the Ministry of Agriculture and Fisheries (MAF) and the agriculture section of the Department of Scientific and Industrial Research (DSIR).

AgResearch's purpose is to enhance the value, productivity and profitability of New Zealand's pastoral, agri-food and agri-technology sector value chains to contribute to economic growth and beneficial environmental and social outcomes for New Zealand. This sector is the backbone of our economy and its continued success is essential to this country's living standards.

The Company works with stakeholders to develop leading-edge scientific solutions for a range of national and international customers, including government agencies, industry bodies and private companies. AgResearch is the lead CRI in the areas of; pasture based animal production systems, new pasture plant varieties, agricultural-derived greenhouse gas mitigation and pastoral climate change adaption, agri-food and bio-based products and agri-technologies and integrated social and biophysical research to support pastoral sector development.

AgResearch has significant assets and operational interests in respect of land within the Greater Christchurch area, the Canterbury Region and neighbouring areas. AgResearch currently operates a Research Campus at the Lincoln Research Centre (located on the corner of Springs Road and Gerald Street in Lincoln). The AgResearch Research Campus currently employs approximately 130 staff. AgResearch also owns an Agricultural Research Farm near Lincoln township, and the Winchmore Research Farm near Ashburton.

The AgResearch Research Campus at Lincoln and the above Agricultural Research Farms represent a significant capital investment in research infrastructure. There is a strong inter-relationship between research activities undertaken at the Agricultural Research Farms and the Lincoln Research Campus. Accordingly, anything that could potentially jeopardise the efficient operation or survival of the Research Centre, could potentially jeopardise the efficient operation or survival of the above Research Farms, and vice versa.

Further, there is significant investment underway between Crown owned research entities, Lincoln University 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. Hence, not only will AgResearch assets be important to AgResearch delivery, but they could also be used by other entities to deliver benefits to New Zealand.

Sound planning is required to ensure that such resources are sufficiently recognised and protected for future generations in terms of the statutory planning documents such as the Proposed Canterbury Air Regional Plan.

2.0 GENERAL SUBMISSION

AgResearch seeks that all the provisions of the Proposed Canterbury Air Regional Plan are retained, except to the extent that specific changes are made in accordance with the relief sought by AgResearch in the balance of this submission and any further submission that AgResearch may make at the appropriate time. Where specific relief is provided, AgResearch would accept words to like effect or as otherwise may be required to ensure sustainable management.

3.0 SPECIFIC SUBMISSIONS

Section 7 Rules - Rural Discharges to Air

3.1 Rule 7.66

3.1.1 Submission

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 AgResearch’s Lincoln Research Farm is located within 1500 metres of Lincoln Township, and as a result the proposed rule could inhibit future research related activities on this property.

AgResearch 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.

3.1.2 Relief Sought

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 1500m 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.*

3.2 Rule 7.67

3.2.1 Submission

AgResearch supports the restricted discretionary activity status of Rule 7.67.

3.2.2 Relief Sought

Retain Rule 7.67.

3.3 Rule 7.68

3.3.1 Submission

Rule 7.68 requires the immediate preparation of an Odour Management Plan in accordance with Schedule 2. AgResearch 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 (n.b. 1 January 2017).

Conditions 4 and 5 detail specific requirements for pH and dissolved oxygen in liquid or slurry effluent. AgResearch 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).

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).

3.3.2 Relief Sought

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, A~~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.~~*

3.4 Rule 7.69

3.4.1 Submission

AgResearch supports the restricted discretionary activity status of Rule 7.69.

3.4.2 Relief Sought

Retain Rule 7.69.

Signature: **AGRESEARCH LTD**

by its authorised agents Environmental Management Services Ltd

A handwritten signature in black ink, appearing to read 'G.J. Mathieson', with a large, sweeping flourish at the end.

G.J. Mathieson

Date: 1st May 2015