

**From:** [Lucy Johnson](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Lucy Johnson](#)  
**Subject:** Air Plan Submission  
**Date:** Friday, 1 May 2015 4:03:45 p.m.  
**Attachments:** [Air Plan 2015.pdf](#)  
[20150501195852170.pdf](#)

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Hi Ecan,

Please find a submission on behalf of Purata.

Many Thanks  
Lucy

**Lucy Johnson**  
General Manager Environment

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# Submission on the Proposed Canterbury Air Regional Plan

FOR OFFICE USE ONLY

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: LUCY-JANE ELIZABETH JOHNSON Phone (Hm): \_\_\_\_\_

Organisation\*: PURATA FARMING LTD Phone (Wk): \_\_\_\_\_  
\* the organisation that this submission is made on behalf of

Postal Address: PO BOX 99, DARFIELD Phone (Cell): 0274592303  
7541 Postcode: \_\_\_\_\_

Email: lucy@puratafarming.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: [Handwritten 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



Dear Sir/Madam

## **Proposed Canterbury Air Regional Plan.**

Purata Farming Limited (Purata) owns 13 dairy farms in central Canterbury, making it one of the largest dairy farm operations in New Zealand with a total land holding of 4,390 hectares. Purata produced 5.5 million kilograms of milk solids in the 2013/2014 season. Synlait estimate that there is currently approximately \$13.8 billion of investment in dairy farms in the Canterbury region with an average size of 219ha (equivalent to c.\$8 million per farm).

Purata has historically been involved in farm development and conversion to dairy, having developed over 4,000 hectares of dry pasture land into dairy farms, purchased over 800 hectares of existing dairy farms and developed a further 700 hectares for dairy support.

Purata farms are located in the Canterbury region, one of the world's most productive pastoral dairy regions with access to reliable sources of irrigation water. Irrigation is fundamental to pastoral dairying in Canterbury and Purata has robust access to sufficient water to irrigate all of the farms. Further protection of the current environment in which we operate and grow our business is important to the sustainability of our business and communities.

The management philosophy has been to maintain high quality infrastructure and as a result Purata's assets are well invested. Purata sets high standards in environmental management and has invested in industry leading systems, processes and infrastructure to manage its environmental footprint. In order to allow further adoption of good practice, capital investment and production efficiencies sound regulation is required to drive such behaviours. Failure to allow this flexibility and ownership of issues may result in little to no environmental gains being made.

New Zealand's dairy industry is internationally recognised for its low cost, pasture based farming system, large-scale processing, innovations in new product development, and farm production technology. Certainty over the planning and regulatory environment in which Purata operate is paramount in maintaining these advantages and financial security to grow international markets opportunities for the industry.

Purata appreciate the opportunity to provide feedback on Proposed Air Plan.

Purata welcomes the opportunity to work with Environment Canterbury as the Air Plan is refined. Please find a copy of our submission attached.

Page	Provision	Support / Oppose	Issue	Relief sought
<i>Policies</i>				
5-1	Objective 5-9	Support in part.	<p>We support inclusion of this objective seeking that activities locate in appropriate areas. The policies and rules supporting this objective are focused however on preventing activities from locating in inappropriate areas; there is little provision to support activities that are seeking to locate in appropriate areas.</p> <p>Where an activity is proposed for a suitable location this should be recognised in the consent process.</p> <p>Further the objective should provide protection from reverse sensitivity for existing discharges to air that have been appropriately located, by preventing sensitive activities moving close to them.</p>	<p>Amend Objective 5-9:</p> <p><i>New activities are spatially located so that they result in appropriate air quality outcomes being achieved both at present and in the future.</i></p> <p>Provide a stronger focus on achieving this objective in the relevant policies and rules.</p>
6-1	Policy 6.5	Support in part	<p>This policy sends a clear signal that offensive and objectionable odour is unacceptable and requires the characteristics of odour to be known and managed.</p> <p>Purata agree that offensive and objectionable odour is not acceptable. Odour is extremely subjective and variable. We welcome the guidance the pCARP provides to consent applicants, council staff and the community on how to assess odour.</p>	

			It is critical that the plan provisions detailing how odour is to be assessed are fair and robust, striking a balance between ensuring truly offensive and objectionable odour doesn't occur, without unduly penalising an activity should someone take an unfairly sensitive position toward it.	
6-1	Policy 6.7	Oppose	<p>This policy requires that where land use has been authorised that results in new activities being significantly adversely affected by an existing discharge, that discharge is expected to reduce its effects or relocate.</p> <p>Purata strongly oppose this policy as it penalises existing activities which have been failed by district and sometimes regional planning processes if sensitive activities have been allowed to establish within their area of effects. This policy essentially authorises reverse sensitivity in these cases; it is unfair and unlawful to require the original activity to reduce or relocate at significant cost.</p> <p>There is no guidance in the RMA for determining if an activity is 'significantly adversely affected'.</p> <p>This policy is inconsistent with the RPS.</p>	Delete Policy 6.7
6-1	Policy 6.8	Oppose in part	Purata support longer consent duration for activities that have been appropriately located,	Delete Policy 6.8 and carry over the matters for discretion listed in section 1.3.5 of the NRRP for consent duration.

			<p>but suggest this policy is too narrow in linking it to the potential for reverse sensitivity.</p> <p>Consent duration must take into consideration a wider set of factors, including the level of investment and available means to control effects, and the degree to which best practice is achieved.</p>	
6-1	Policy 6.10	Support in part	<p>We support encouraging use of the best practicable option but consider the words 'at least' are unnecessary. This implies there may be something better than best practicable option that could be applied.</p>	<p>Amend Policy 6.10:</p> <p><i>All activities that discharge into air apply, <del>at least,</del> the best practicable option so that cumulative effects are minimised.</i></p>
6-1	Policy 6.12	Support in part	<p>Purata are supportive of new and improved technology being adopted over time and as consents are renewed. However we note it is highly important that requirements to upgrade infrastructure is subject to a robust best practicable option assessment to ensure requirements are reasonable.</p>	
<b>Rules</b>				
7-21	Rule 7.68	Oppose in part	<p>We oppose conditions 4 and 5 of the permitted activity rule. These parameters cannot easily be determined, to the extent it is inappropriate to include them as a condition for a permitted activity. We consider these limits to be unnecessary.</p> <p>The benefit of requiring a record be kept for 3 months under condition 6 is somewhat unclear. We suggest this overlaps significantly with the farm environment plan required for the</p>	<p>Delete conditions 4, 5 and 6 of Rule 7.68.</p>

			<p>associated discharge to land of effluent; it would be more appropriate to leave this data to be recorded as part of the FEP.</p> <p>The paperwork requirements on farmers have increased dramatically in recent years, across all aspects of their business. To promote efficiency we suggest CRC requirements should be streamlined wherever possible and the FEP is the logical way to do this.</p> <p>The definition of 'liquid and slurry animal effluent or solid animal effluent' is not defined. To improve clarity on the applicability of this rule then the term liquid and slurry should be defined.</p> <p>Purata would propose that these various effluent streams vary in the nature and potential for odour. Therefore the rule is somewhat more restrictive regardless of the potential impact and variability these waste streams can generate.</p>	
7-22	7.70	Oppose in part	<p>Purata propose that for consistency with the pLWRP that reference to 'offal pits' is amended to 'farm pits'.</p> <p>This change better reflects the on-farm use and purpose for such infrastructure.</p>	<p><i>"...biodegradable wastes disposed of in a <u>farm pit</u> is a permitted activity..."</i></p>