

From: [Emily Buckingham](#)
To: [Mailroom Mailbox](#)
Cc: [Mark St Clair](#); [Simon Cooper \(WWBCHCH\)](#)
Subject: Proposed Air Plan
Date: Thursday, 9 July 2015 4:22:53 p.m.
Attachments: [Canterbury Air Plan further submission WWB.pdf](#)

Dear whom it may concern,

Please find attached the further submissions of Winstone Wallboards Limited on original submissions to the proposed Canterbury Air Regional Plan. Please confirm receipt.

I confirm that Winstones will serve a copy of this submission upon the relevant original submitters.

Kind regards,

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**FURTHER SUBMISSION ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR
REGIONAL PLAN UNDER CLAUSE 8 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT
ACT 1991**

TO: Freepost 1201
Proposed Canterbury Air Regional Plan
Environment Canterbury
PO Box 345
CHRISTCHURCH 8140

Name: Winstone Wallboards Limited, a division of Fletcher Building
215-219 Opawa Road
Opawa
Christchurch

**Address
for service:** Hill Young Cooper Limited
P O Box 8092
The Terrace
WELLINGTON 6143

Attention: Mark St Clair

Phone: (04) 473 5310
E-mail: m.stclair@hyc.co.nz

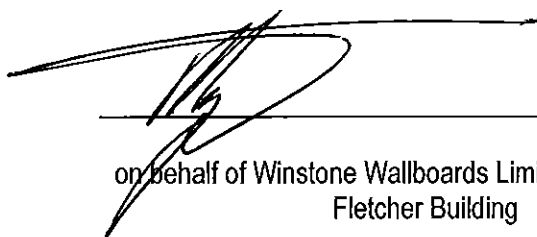
This is a further submission in support of and opposition to submissions on the Proposed Canterbury Air Regional Plan.

- 1. Winstone Wallboards has an interest in the proposal that is greater than the interest the general public has.**

Winstone Wallboards was an original submitter on the provisions / subject matter that these further submissions relate to, and the viability of its ongoing industrial operations in Canterbury is potentially affected by the plan.

- 2. Winstone Wallboards does wish to be heard in support of its further submission.**
- 3. Winstone Wallboards would be prepared to consider presenting its further submission in a joint case with others making a similar submission at any hearing.**

DATED 9.7.15



on behalf of Winstone Wallboards Limited, a division of
Fletcher Building

Winstone Wallboards (WWB) further submission

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p><u>Selwyn District Council</u> 2 Norman Kirk Drive Rolleston 7614 Attn: Ms Jessica Tuilaepa</p>	<p>pCARP-111 <i>Insert a definition: <u>'Bulk solid materials include all materials consisting of fragments or particulates that could be discharged as dust or particulate. These materials include, but are not limited to: gravel, quarried rock, fertiliser, coal, cement, flour, rock aggregate, grains and wood chips'</u></i></p>	<p>WWB requested a definition be added for 'bulk solid materials', and considers that the wording suggested by the submitter is acceptable.</p>	<p>Support - Seek Accept</p>
<p><u>Ballance Agri-Nutrients Limited</u> Private Bag 12 503 Tauranga Mail Centre Tauranga 3143 Attn: Warwick Catto</p>	<p>pCARP-2182 <i>Insert a new objective as follows: <u>Provide for industry and trade activities that rely on operational air discharges and that operate in accordance with industry best practice.</u></i></p>	<p>A new objective recognising the operational requirements of heavy industry would support the ongoing operations of existing industrial activities.</p>	<p>Support - Seek Accept</p>
<p><u>Carter Holt Harvey Pulp & Paper Ltd</u> Private Bag 92004 Auckland Mail Centre Auckland 1142 Attn: Mr M Parrish</p>	<p>pCARP-2356 <i>Insert a new objective as follows: <u>The operational requirements of heavy industry and other location specific industry is recognised and provided for.</u></i></p>	<p>A new objective recognising the operational requirements of heavy industry would support the ongoing operations of existing industrial activities.</p>	<p>Support - Seek Accept</p>

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p><u>Horticulture New Zealand</u> C/- Natural Resources and Environment P O Box 10-232 Wellington 6143 Attn: Chris Keenan</p>	<p>pCARP-1068 <i>Amend Objective 5.8 as follows: <u>Manage air quality to reflect the different receiving environments across the region, taking into account the location and characteristics of the background receiving environments.</u></i></p>	<p>WWB's submission supported this objective, but WWB agrees that the objective is not worded to read as an objective. The submitter's suggested changes will remedy this.</p>	<p>Support - Seek Accept</p>
<p><u>Ravensdown Fertiliser Co-operative Limited</u> P O Box 51-282 Tawa Wellington 5249 Attn: Mr Chris Hansen</p>	<p>pCARP-2724 <i>Retain objective 5.8 but re-word it so that it reads as an objective.</i></p>	<p>WWB's submission supported this objective, but WWB agrees that the objective is not worded to read as an objective.</p>	<p>Support - Seek Accept</p>
<p><u>Ravensdown Fertiliser Co-operative Limited</u> P O Box 51-282 Tawa Wellington 5249 Attn: Mr Chris Hansen</p>	<p>pCARP-2727 <i>Provide alternative relief relating to submission point 2726 by amending Objective 5.9 as follows: <u>Working with district councils new activities are spatially located so that they do not result in reverse sensitivity issues with existing activities that have lawfully established air discharges and to ensure appropriate air quality outcomes are being achieved both at present and in the future.</u></i></p>	<p>The proposed wording of the objective would assist in providing alternative relief to WWB's concerns with objective 5.9 raised in its original submission.</p>	<p>Support - Seek Accept</p>

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p><u>Bathurst Resources Limited</u> PO Box 5963 Lambton Quay Wellington 6145 Attn: Ms Alison Brown</p>	<p>pCARP-2226 <i>Delete all policies that limit discharges of PM2.5 and instead adopt a policy that requires appropriate monitoring and assessment (to [accurately] characterise the scale of PM2.5 emissions, actual impacts on human health, and the appropriateness of adopting the WHO guidance values as guidelines) to be undertaken in airsheds and clean air zones prior to the introduction of rules.</i></p>	<p>WWB shares the submitter's concerns about the lack of information on PM2.5 levels and the inappropriateness of policies limiting PM2.5 in the absence of adequate information.</p>	<p>Support - Seek Accept</p>
<p><u>St Georges Hospital</u> C/- Golder Associates NZ Ltd Attn Mr J Bluett PO Box 2281 Christchurch 8140</p>	<p>pCARP-773 <i>Amend Policy 6.2 by amalgamating with Policy 6.3 as follows: <u>Minimise Avoid, remedy or mitigate</u> adverse effects on <u>ambient air quality where measured concentrations in the airshed exceeds are between 66% and 100% of the guideline values , for the contaminants listed in Part 3 of Schedule 4, and set out in the Ambient Air Quality Guidelines 2002 Update, so that concentrations ambient air quality is improved do not exceed 100% of those guideline values.</u> Where concentrations of contaminants exceed 100% of guideline values set out in the Ambient Air Quality Guidelines, action is taken to improve air quality.</i></p>	<p>As per WWB's original submission it believes that the values mentioned in the policies should refer to the NES instead of the AAQG, but WWB also considers that the submitter's suggestion to amalgamate and reword Policies 6.2 and 6.3 makes sense.</p>	<p>Support - Seek Accept in Part</p>

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<u>Horticulture New Zealand</u> C/- Natural Resources and Environment P O Box 10-232 Wellington 6143 Attn: Chris Keenan	pCARP-1073 <i>Amend Policy 6.7 as follows: <u>Avoid activities sensitive to discharges to air establishing in areas or in proximity to existing lawfully established activities that discharge to air</u></i>	The proposed wording of the policy would also provide alternative relief to WWB's concerns with Policy 6.7 raised in its original submission.	Support - Seek Accept
<u>Ballance Agri-Nutrients Limited</u> Private Bag 12 503 Tauranga Mail Centre Tauranga 3143 Attn: Warwick Catto	pCARP-2205 <i>Delete Policy 6.7 and replace with the following Policy: <u>Policy 6.7 Minimise the risk to Canterbury's communities by separating incompatible land use activities from existing industry that are reliant upon operational air discharges.</u></i>	The proposed wording of the policy would also provide alternative relief to WWB's concerns with Policy 6.7 raised in its original submission.	Support - Seek Accept
<u>Fonterra Co-Operative Group Limited</u> c/- Justine Ashley Planz Consultants Limited PO Box 1845 Christchurch 8140	pCARP-714 <i>Delete Policy 6.8 and insert the following: <u>Provide longer consent durations for the discharge of contaminants into air where the sensitivity of the receiving environment, the level of investment made in the activity and the ability to minimise adverse effects on air quality achieves sustainable management.</u></i>	WWB agrees with the reasoning behind this submission point and considers that the alternative wording proposed would go some way towards remedying WWB's own concerns with Policy 6.8.	Support - Seek Accept

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p><u>Bathurst Resources Limited</u> PO Box 5963 Lambton Quay Wellington 6145 Attn: Ms Alison Brown</p>	<p>pCARP-2232 <i>Amend or delete all relevant policies relating to discharges into air from large scale, industrial and trade premises to make adequate and appropriate provision for existing industrial and commercial activities to continue their existing activities and to be able to expand on existing sites and for new industrial and commercial activities to locate and commence on appropriate sites.</i></p>	<p>WWB shares the submitter's concerns about the policies in the plan not adequately providing for the ongoing operations of established industrial activities.</p>	<p>Support - Seek Accept</p>
<p><u>Ravensdown Fertiliser Co-operative Limited</u> P O Box 51-282 Tawa Wellington 5249 Attn: Mr Chris Hansen</p>	<p>pCARP-2765 <i>Insert a new policy as follows: <u>6.19B Ensure discharges of contaminants into air associated with existing large scale, industrial and trade activities and nationally and regionally significant infrastructure, are not adversely affected or constrained by changes in the surrounding land use patterns that may occur over time.</u></i></p>	<p>WWB would support this new policy if Policy 6.19 was amended to apply to new air discharges only, as suggested by the submitter. The suggested changes are consistent with the policy of the Canterbury RPS.</p>	<p>Support - Seek Accept</p>
<p><u>Ravensdown Fertiliser Co-operative Limited</u> P O Box 51-282 Tawa Wellington 5249 Attn: Mr Chris Hansen</p>	<p>pCARP-2738 <i>Amend Policy 6.11 as follows: Recognise ... <u>infrastructure and large scale industrial and trade activities</u> to the regional and national economy and provide for the operation and development of that <u>those infrastructure and activities.</u></i></p>	<p>The suggested changes would more adequately recognise the importance of enabling the continued operations of key industrial activities.</p>	<p>Support - Seek Accept</p>

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p><u>St George's Hospital Limited</u> C/- Golder Associates NZ Ltd Attn Mr J Bluett PO Box 2281 Christchurch 8140</p>	<p>pCARP-789 <i>Amend Policy 6.19 as follows: Enable discharges of contaminants associated with large scale <u>fuel burning devices</u>, industrial and trade activities and nationally and regionally significant and critical infrastructure, in locations which are <u>spatially appropriate for the activity where the discharge is compatible with the surrounding land use pattern and while ensuring that adverse effects on air quality are avoided, remedied or mitigated</u> minimised.</i></p>	<p>WWB's submission supported this policy, but considers that the submitter's proposed wording has merit in referring to 'locations which are spatially appropriate' rather than being 'compatible with the surrounding land use pattern'. WWB supports this part of the submission. The reference to being compatible with the surrounding land use pattern would leave established activities open to reserve sensitivity effects, potentially impacting upon consent renewals.</p>	<p>Support - Seek Accept in Part</p>
<p><u>Bathurst Resources Limited</u> PO Box 5963 Lambton Quay Wellington 6145 Attn: Ms Alison Brown</p>	<p>pCARP-2234 <i>Amend or delete all relevant rules relating to discharges into air from large scale, industrial and trade premises to make adequate and appropriate provision for existing industrial and commercial activities to continue their existing activities and to be able to expand on existing sites and for new industrial and commercial activities to locate and commence on appropriate sites</i></p>	<p>WWB shares the submitter's concerns about the rules in the plan not adequately providing for the ongoing operations of established industrial activities.</p>	<p>Support - Seek Accept</p>
<p><u>Ravensdown Fertiliser Co-operative Limited</u> P O Box 51-282 Tawa Wellington 5249 Attn: Mr Chris Hansen</p>	<p>pCARP-2800 <i>Insert a restricted discretionary rule for activities that do not meet one or more of the Conditions of Rule 7.37</i></p>	<p>WWB agrees that the effects of bulk solid material handling not meeting the permitted activity conditions could be managed through a limited number of matters for restricted discretion instead of being fully discretionary.</p>	<p>Support - Seek Accept</p>

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p>Ravensdown Fertiliser Co-operative Limited P O Box 51-282 Tawa Wellington 5249 Attn: Mr Chris Hansen</p>	<p>pCARP-2802 <i>Insert a restricted discretionary rule for activities that do not meet one or more of the Conditions of Rule 7.38</i></p>	<p>WWB agrees that the effects of bulk solid material storage not meeting the permitted activity conditions could be managed through a limited number of matters for restricted discretion instead of being fully discretionary.</p>	<p>Support - Seek Accept</p>
<p>Fonterra Co-Operative Group Limited c/- Justine Ashley Planz Consultants Limited PO Box 1845 Christchurch 8140</p>	<p>pCARP-725 <i>Provide alternative relief to deleting Rule 7.14 and amending airshed boundaries gazetted under the National Environmental Standards for Air Quality to match District Plan urban areas (point pCARP-724) as follows: <u>Within a Clean Air Zone polluted airshed as defined under Regulation 17 of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004</u>, the discharge of PM10 into air from a large scale burning device, where concentrations of PM10 will likely be equal to or exceed 2.5 micrograms per cubic metre at ground level at or beyond the boundary of the property of origin, is a restricted discretionary activity provided the following condition is met:</i> 1. 100% of the discharge will be off-set within the <u>gazetted polluted</u> airshed in accordance with Regulation 17 of the Resource Management (National Environmental Standards for Air Quality) Regulation 2004. <i>The exercise of discretion is restricted to the following matters:</i> 1. The proposal to off-set 100% of the emissions within the gazetted <u>polluted</u> airshed to ensure that there is no net increase of PM10 emissions; and 2. The matters set out in rule 7.2.</p>	<p>As well as the relief sought in regards to Rule 7.14 in WWB's original submission, WWB agrees that the reference in this rule should be to 'polluted airsheds' rather than 'Clean Air Zones' to make the rule consistent with the NES.</p>	<p>Support - Seek Accept</p>

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p><u>New Zealand Defence Force</u> C/- Property Group Attn Rob Owen Private Bag 902 Upper Hutt 5140</p>	<p>pCARP-2269 <i>Amend Rule 7.14 to reflect Regulation 17 of the National Environmental Standards for Air Quality and specify a default activity status for activities which do not comply with rule 7.14 but are not prohibited by Regulation 17 of the National Environmental Standards.</i></p>	<p>WWB agrees that Rule 7.14 needs to accurately reflect Regulation 17 of the NES and that there is an issue with no default activity status being specified for activities not covered by Rules 7.14-7.18. For example there is no rule in this section referring to discharges of PM10 that increase existing PM10 levels beyond the boundary by less than 2.5µg/m³ which are allowed for by the NES.</p>	<p>Support - Seek Accept</p>
<p><u>Ravensdown Fertiliser Co-operative Limited</u> P O Box 51-282 Tawa Wellington 5249 Attn: Mr Chris Hansen</p>	<p>pCARP-2779 <i>Delete Rule 7.18 and replace with a rule providing for large scale and industrial and trade premises within the Clean Air Zone, as a discretionary activity</i></p>	<p>WWB is also concerned at the prospect of legally established, consented large scale industrial activities being classified as prohibited activities. Discretionary activity status would be more appropriate and WWB seeks this status in addition to the relief sought for Rule 7.18 in its original submission.</p>	<p>Support - Seek Accept</p>

WWB supports or opposes the submission of:	The particular parts of the submission WWB supports or opposes are:	The reasons for WWB's support or opposition are:	Support or oppose
<p><u>Chevron New Zealand</u> PO Box 1433 Shortland Street Auckland 1140 Attn: Patrick Mulligan</p>	<p>pCARP-1658 <i>Provide appropriate alternative relief should management plan requirements for permitted activities be retained in Schedule 2: Assessment of offensive and objectionable effects. The submitter seeks that management plan provisions are amended to provide greater guidance for specific permitted activities (in particular, air discharges from the storage and transport of petroleum products). Such detail may include specific environmental standards as well as mitigation methods and technological measures to be adopted. Directions will also need to be included in the proposal regarding how the adequacy of management plans will be assessed for enforcement purposes.</i></p>	<p>WWB's original submission sought to simplify the text describing the content of management plans, because management plans are required for a range of permitted activities, and the appropriate content will depend upon the nature of the activity and scale of effects. WWB does not agree that it would help to have more specific requirements for each activity in this schedule, as any key standards for particular activities should form part of the relevant rule. The permitted activities are simply required to prepare a management plan. WWB does agree with the submitter that it is undesirable for council to retain too high a level of discretion in regards to the content and acceptability of management plans, thereby creating uncertainty for the activities.</p>	<p>Oppose - Seek Reject</p>