

**From:** [Sarah Drummond](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** FW: Further submission on Proposed Canterbury Air Regional Plan  
**Date:** Friday, 10 July 2015 9:37:47 a.m.  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[FSub001-PCARP-TIM Nominees-rpk-final.pdf](#)  
[Table003-FSub-TIM Nominees-final-rpk.pdf](#)

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For Trimming Please

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**From:** Reina Kumar [mailto:[r.kumar@harrisingrierson.com](mailto:r.kumar@harrisingrierson.com)]  
**Sent:** Friday, 10 July 2015 9:28 a.m.  
**To:** Sarah Drummond  
**Cc:** Clare Covington  
**Subject:** Further submission on Proposed Canterbury Air Regional Plan

Hi Sarah,

Please see attached our further submission on the Proposed Canterbury Air Regional Plan in relation to the site at 4-20 (even numbers) (Lot 3 DP 319719) and 36 Izone Road and (Lot 2 DP 342459). The submission is made on behalf of our client, TIM Nominees Limited.

Can you please confirm acceptance by email once you have received the submission.

Please do not hesitate to contact me if you have any questions.

Regards,  
Reina



**REINA KUMAR**  
**Planner**

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All our emails and attachments are subject to [conditions](#).

## Form 3

# FURTHER SUBMISSIONS ON THE PAUP

Clause 8 of Schedule 1, Resource Management Act 1991

**TO: SARAH DRUMMOND  
ENVIRONMENT CANTERBURY  
PO BOX 364  
CHRISTCHURCH 8140**

### FOR ENVIRONMENT CANTERBURY OFFICE USE ONLY

Submission No:

Receipt Date:

**TO: ENVIRONMENT CANTERBURY (THE COUNCIL)**

**NAME: TIM NOMINEES**

1. These are further submissions in support of or opposition to a number of submissions on the Proposed Canterbury Air Regional Plan (**the Plan**).
2. TIM Nominees could not gain an advantage in trade competition through these submissions.
3. TIM Nominees made an original submission on the Plan.
4. TIM Nominees have an interest in the Plan that is greater than the interests of the general public. They are owners of a property at 4 -20 (even numbers) (Lot 3 DP 319719) and 36 Izone Road and (Lot 2 DP 342459).
5. TIM Nominees would like to note that their support for Policy 6.6 which formed part of the primary submission has not been noted in the Summary of Submissions. TIM Nominees request that this submission point is accurately recorded to indicate their support for this policy.
6. The further submissions are contained in Table 1 on the attached sheet.
7. TIM Nominees wish to be heard in support of their submissions.
8. If others make a similar submission, TIM Nominees will consider presenting a joint case with them at the hearing.

### SUBMITTER DETAILS

**Date:** 10 July 2015

**Signed:**



**Address for Service:**

TIM Nominees  
c/- Harrison Grierson  
P O Box 5760, Wellesley Street  
Auckland 1141

Attention: Reina Kumar

**Email:** [r.kumar@harrisingrierson.com](mailto:r.kumar@harrisingrierson.com)

**Telephone:** 09 917 5000

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TABLE 1: TIM NOMINEES FURTHER SUBMISSIONS					
PROVISION	SUBMITTER	SUBMISSION REF	SUMMARY OF RELIEF REQUESTED IN ORIGINAL SUBMISSION	SUPPORT/OPOSE	REASONS/RELIEF SOUGHT
Central Policies Applying to All Activities	Lowe Corporation Limited and Colyer Mair Assets Limited	pCARP-2619	Insert a new policy as follows: <u>Where considering location of sensitive activities, avoid encroachment on existing activities discharging contaminants to ensure that land uses are appropriately located.</u>	Support	TIM Nominees supports the inclusion of a new policy as it protects existing activities which generate air discharge and it also places the responsibility on the owner/developer to not locate near discharging activities.
Industrial and large scale discharges to air	Ravensdown Fertiliser Cooperative Limited	pCARP-2765	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>	Support	TIM Nominees supports the inclusion of a new policy as it ensures that existing air discharge activities are protected recognised as important and protected from future land use changes which can potentially hamper its operation.
Objectives5	Carter Holt Harvey Pulp & Paper Ltd	pCARP-2360	Insert a new objective as follows: <u>Incompatible land uses and activities are adequately separated to avoid, remedy or mitigate adverse effects of air discharges, and reverse sensitivity conflicts.</u>	Support in part	TIM Nominees supports, in part, a new objective as requested by this submitter which introduces incompatible land uses. However, it appears that the submitter has conflated two key resource management issues together which are incompatible land uses and reverse sensitivity. Incompatible land uses will prevent two activities with conflicting effects being located adjacent to each other. Whereas, reverse sensitivity occurs when an existing lawfully established activity is encroached by a more sensitivity activity, which threatens its operation. TIM Nominees agrees with the submitter that a new objective should be added as to prevent air discharge effects from arising due to incompatible land uses and requests that the submitters request be amended as follows: <u>Incompatible land uses and activities are adequately separated to avoid, remedy or mitigate adverse effects of air discharges, and reverse sensitivity conflicts</u>
General Definitions Table 2.1	Horticulture New Zealand	pCARP-1065	Insert a definition for "reverse sensitivity" as follows: <u>Reverse Sensitivity - Means the vulnerability of an existing lawfully established activity to complaint from other activities located in the vicinity which are sensitive to adverse environmental effects that may be lawfully generated by the existing activity, thereby creating the potential for the operation of the existing activity to be constrained.</u>	Support	TIM Nominees support the inclusion of a definition of 'reverse sensitivity' as per the submitter's request as it is not defined in the Plan.
Objective 5.9	Winstone Wallboards Limited, a division of Fletcher Building	pCARP-2080	Delete Objective 5.9.	Oppose	TIM Nominees opposes the deletion of this policy as it ensures that activities are located in appropriate locations to result in appropriate air quality outcomes both at present and in the future.
Objective 5.9	Fletcher Building Limited	pCARP-2322	Delete Objective 5.9.	Oppose	TIM Nominees opposes the deletion of this policy as it ensures that activities are located in appropriate locations to result in appropriate air quality outcomes both at present and in the future.
Policy 6.6	Winstone Wallboards Limited, a division	pCARP-2185	Retain Policy 6.6.	Support	TIM Nominees would like to note that their support for Policy 6.6 which formed part of the primary submission has not been noted in the Summary of Submissions. TIM Nominees request that this submission point is accurately recorded to indicate their support for this policy. TIM Nominees supports this submitter's request at it will ensure that discharging activities are located in appropriate locations.

TABLE 1: TIM NOMINEES FURTHER SUBMISSIONS					
PROVISION	SUBMITTER	SUBMISSION REF	SUMMARY OF RELIEF REQUESTED IN ORIGINAL SUBMISSION	SUPPORT/OPOSE	REASONS/RELIEF SOUGHT
	of Fletcher Building				
Policy 6.7	Lyttelton Port Company Limited	pCARP-752	Delete Policy 6.7.	Support	TIM Nominees supports the deletion of this policy as it authorises the potential for reverse sensitivity. It is also unreasonable to request lawfully established discharging activities located in appropriate locations to relocate.
Policy 6.7	St George's Hospital Limited	pCARP-781	Delete Policy 6.7.	Support	TIM Nominees supports the deletion of this policy as it authorises the potential for reverse sensitivity. It is also unreasonable to request lawfully established discharging activities located in appropriate locations to relocate.
Policy 6.7	Lowe Corporation Limited and Colyer Mair Assets Limited	pCARP-2614	Delete Policy 6.7.	Support	TIM Nominees supports the deletion of this policy as it authorises the potential for reverse sensitivity. It is also unreasonable to request lawfully established discharging activities located in appropriate locations to relocate.
Policy 6.7	Purata Farming Ltd	pCARP-2679	Delete Policy 6.7.	Support	TIM Nominees supports the deletion of this policy as it authorises the potential for reverse sensitivity. It is also unreasonable to request lawfully established discharging activities located in appropriate locations to relocate.
Policy 6.7	Ravensdown Fertiliser Cooperative Limited	pCARP-2735	Delete Policy 6.7.	Support	TIM Nominees supports the deletion of this policy as it authorises the potential for reverse sensitivity. It is also unreasonable to request lawfully established discharging activities located in appropriate locations to relocate.
Policy 6.7	Gelita (NZ) Limited	pCARP-2915	Delete Policy 6.7.	Support	TIM Nominees supports the deletion of this policy as it authorises the potential for reverse sensitivity. It is also unreasonable to request lawfully established discharging activities located in appropriate locations to relocate.
Policy 6.7	Mobil New Zealand Limited, BP Oil New Zealand Limited, and Z Energy Limited	pCARP-3113	Delete Policy 6.7	Support	TIM Nominees supports the deletion of this policy as it authorises the potential for reverse sensitivity. It is also unreasonable to request lawfully established discharging activities located in appropriate locations to relocate.
Policy 6.7	Ballance Agri-Nutrients Limited	pCARP-2205	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>	Support in part	TIM Nominees support the submitter's proposed new policy in part as it focuses on incompatible land uses. TIM Nominees agrees that a policy preventing incompatible land uses being located adjacent to each other is necessary and should be provided as an additional policy.
Policy 6.8	Carter Holt Harvey Pulp & Paper Ltd	pCARP-2368	Delete Policy 6.8.	Oppose	TIM Nominees oppose the deletion of this policy as it enables the continued use of air discharge activities located in appropriate areas.
Policy 6.8	Ravensdown Fertiliser Cooperative Limited	pCARP-2736	Delete Policy 6.8.	Oppose	TIM Nominees oppose the deletion of this policy as it enables the continued use of air discharge activities located in appropriate areas.