

**From:** [Will Rutherford](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Louise Delamare \(Vector Limited\)](#); [Daniel Minhinnick](#)  
**Subject:** Proposed Air Plan  
**Date:** Friday, 10 July 2015 11:52:14 a.m.  
**Attachments:** [Air Plan - Further submission - Vector Limited - 63105.pdf](#)

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Good morning

Please find **attached** a copy of Vector Limited's further submission on the Proposed Canterbury Air Regional Plan. (Vector Limited's submitter ID number is 63105.)

Please let me know if you have any further questions.

Kind regards

Will

**Will Rutherford**

GRADUATE

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## **Russell McVeagh**

2014 ILO New Zealand Client Choice Firm of the Year, 2014 IFLR Asia New Zealand Women in Law Firm of the Year, NZ Law Awards M&A, Capital Markets and International Deals of the Year 2014, 2014 Australasian Lawyer Employer of Choice

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## FURTHER SUBMISSION IN SUPPORT OF SUBMISSIONS ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

**TO:** Canterbury Regional Council ("**Council**")

**FURTHER SUBMISSION ON:** Proposed Canterbury Air Regional Plan ("**Proposed Plan**")

**NAME:** Vector Limited ("**Vector**")

**ADDRESS:** C/- Russell McVeagh, at the address for service specified below.

### Scope of further submission

1. This is a further submission in support of the submissions made by Chevron New Zealand (submitter 1648) and Mobil New Zealand Limited, BP Oil New Zealand Limited, and Z Energy Limited (submitter 3125) on the Proposed Canterbury Air Regional Plan.
2. Vector is New Zealand's leading multi-network infrastructure company, owning, operating and managing a unique portfolio of energy and fibre optic infrastructure networks. One of those portfolios is OnGas, which plays a major role in the supply and distribution of LPG throughout the Canterbury Region. Vector's OnGas operations rely on their ability to store and supply LPG at various retailers throughout Canterbury, including service stations, hardware stores and convenience stores.
3. Vector is specifically interested in Rule 7.34 of the Proposed Plan, which provides for the discharge of contaminants into air from the storage or transfer of petroleum products, including vapour ventilation and displacement. Rule 7.34 permits these activities provided that the conditions are complied with.

### Submissions supported

4. The submissions supported are set out in the Schedule **attached** to this further submission.

### Reasons for further submission

5. Vector supports the submissions set out in the **attached** Schedule for the general reasons that the submissions, if accepted, will:
  - (a) promote the sustainable management of resources, and therefore will achieve the purpose of the Resource Management Act 1991 ("**Act**");

- (b) align with Part Two and other provisions of the Act;
  - (c) meet the reasonably foreseeable needs of future generations;
  - (d) enable social, economic and cultural well being of people in the Canterbury Region; and
  - (e) align with the objectives and policies of the Proposed Plan.
6. In particular, and without limiting the generality of paragraph 5 above, Vector supports the deletion of conditions (ii) and (iii) of rule 7.34 for the following reasons:
- (a) The application of a management plan condition to permitted discharges is overly stringent and disproportionate to the scale of the impact on the environment from any discharge caused by OnGas operations.
  - (b) Conditions (ii) and (iii) are unnecessary in the context of discharges from activities such as the OnGas operations.

### Decision sought

7. Vector seeks the following relief:
- (a) The submissions set out in the **attached** Schedule to be accepted and adopted into the Proposed Plan.
  - (b) Such further orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.
8. Vector wishes to be heard in support of this further submission.

**Signature:** **VECTOR LIMITED** by its solicitors and authorised agents  
Russell McVeagh:




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Bal Matheson / Daniel Minhinnick

**Date:** 10 July 2015

**Address for Service:** C Vector Limited  
C/- Daniel Minhinnick  
Russell McVeagh  
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**AUCKLAND 1140**

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### SCHEDULE OF SUBMISSIONS SUPPORTED RELATING TO RULE 7.34 OF THE PROPOSED CANTERBURY AIR REGIONAL PLAN

Submission Point ID	Submitter	Submission	Vector's position
1648	Chevron New Zealand	<p>Amend Rule 7.34 to remove the Dust and Odour Management Plan conditions to read:</p> <p>The discharge of contaminants into air from the storage or transfer of petroleum or transfer of petroleum products, including vapour ventilation and displacement, is a permitted activity provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. The discharge does not cause a noxious or dangerous effect.</li> <li>2. If there is a discharge of odour or dust beyond the boundary of the property of origin, an odour and/or dust management plan prepared in accordance with Schedule 2 must be held and implemented by the persons responsible for the discharge into air; and</li> <li>3. The odour and/or dust management plan is supplied to the CRC on request.</li> </ol>	Vector supports this submission to the extent that it is consistent with Vector's original submission.
3125	Mobil New Zealand Limited, BP Oil New Zealand Limited, and Z Energy Limited	<p>Amend rule 7.34, while retaining its intent, as follows:</p> <p>The discharge of contaminants, <u>including odour</u> into air from the storage or transfer of petroleum products, including vapour ventilation and displacement, is a permitted activity provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. The discharge does not cause a noxious or dangerous effect; and</li> <li>2. If there is a discharge of odour or dust beyond the boundary of the property of origin, an odour and/or dust management plan prepared in accordance with Schedule 2 must be held and implemented by the persons responsible for the discharge into air; and</li> <li>3. The odour and/or dust management plan is supplied to the CRC on request</li> </ol>	Vector supports this submission to the extent that it is consistent with Vector's original submission.