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Cc: stephen.godfrey@oriongroup.co.nz; [Darryl Millar](#)
Subject: pCARP Submission from Orion
Date: Friday, 10 July 2015 11:59:19 a.m.
Attachments: [image001.png](#)
[Further Submission-Orion-OR043-FINAL-mf.pdf](#)
[Further Sub Table PCARP-Orion-OR043 FINAL-mf.pdf](#)

Morning

Please find attached a further submission from Orion.

Please acknowledge receipt of this submission.

Regards

Melanie



Melanie Foote
Consultant Planner

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Please note I work Monday, Wednesday and Friday

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**FURTHER SUBMISSION ON PROPOSED CANTERBURY REGIONAL AIR PLAN UNDER CLAUSE 8 OF THE
FIRST SCHEDULE TO THE RESOURCE MANGEMENT ACT 1991**

TO: The Proposed Canterbury Regional Air Plan
Canterbury Regional Council
PO Box 345
Christchurch 8140
Submission lodged by email – mailroom@ecan.govt.nz

FURTHER SUBMISSION BY: Orion New Zealand Limited

SUBMITTER ADDRESS: Orion New Zealand Limited
PO Box 13896
Christchurch 8141

Please note the different address for service below.

INTRODUCTION

1. This further submission is made by Orion New Zealand Limited (Orion).
2. Orion New Zealand Limited (Orion) makes specific further submissions on the Proposed Canterbury Regional Air Plan set out in **Appendix One**.
3. In accordance with Clause 8(1)(b) of the First Schedule of the RMA Orion has an interest in the Proposed Canterbury Regional Air Plan greater than the interest of the general public.
4. Orion could not gain advantage in trade competition through this submission.

HEARING

5. Orion wishes to be heard in support of its further submissions.
6. If others make similar submissions, Orion will consider presenting a joint case with them at the hearing.

Further submission signed for and on behalf of Orion New Zealand Limited



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Resource Management Group Limited
10 July 2015

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Christchurch 8140

Appendix One: Further Submission Table

RULE 7.14: INDUSTRIAL, TRADE AND LARGE SCALE DISCHRGES TO AIR			
Submitter	Submission Point Reference	Support or Oppose	Reasons
<p>Gelita (NZ) Limited C/- Mr Kevin Bligh Senior Planner Golder Associates (NZ) Limited P O Box 2281 Christchurch 8140</p> <p>St Georges Hospital C/-Mr Geoff Bluett Golder Associates (NZ) Limited P O Box 2281 Christchurch 8140</p>	pCARP-2925 and pCARP-805 Rule 7.14	Support	<p>Gelita and St Georges Hospital both seek rule 7.14 be deleted.</p> <ul style="list-style-type: none"> Allow the Submission <p>Orion supports the submission seeking this rule be deleted.</p>
<p>Fonterra Cooperative Group Limited C/- Justine Ashley Planz Consultants Ltd P O box 1845 Christchurch 8140</p>	pCARP-724 Rule 7.14	Support in Part	<p>Fonterra's primary position seeks Rule 7.14 be deleted.</p> <ul style="list-style-type: none"> Allow submission in part <p>Orion supports the deletion of this rule.</p>
RULE 7.17AND 7.18 :INDUSTRIAL, TRADE AND LARGE SCALE DISCHRGES TO AIR			
Submitter	Submission Point Reference	Support or Oppose	Reasons
<p>Fonterra Cooperative Group Limited C/- Justine Ashley</p>	pCARP-728 Rule 7.17	Support in Part	<p>Fonterra seek rule 7.17 be amended as follows:</p> <p>The discharge of contaminants into air from a large scale solid fuel</p>

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Planz Consultants Ltd P O Box 1845 Christchurch 8140			<p>burning device from an industrial or trade premise established prior to 28 February 2015 outside a Clean Air Zone, that will likely result in <u>ambient air quality exceeding guideline</u> values, set out in the Ambient Air Quality guidelines 2002 update, being exceeded is a non-complying activity <u>discretionary activity</u>.</p> <ul style="list-style-type: none"> • Allow submission <p>Orion support this submission in part in relation to seeking a discretionary activity status.</p>
<p>Fonterra Cooperative Group Limited C/- Justine Ashley Planz Consultants Ltd P O Box 1845 Christchurch 8140</p> <p>Higgins Contractors Limited C/- Nick Boyes. Planz Consultants Limited</p>	pCARP –Section 3 How the Plan Works, page 3-2	Support	<p>Both submitters seeks deletion of the following:</p> <p>Non-complying activities require resource consent, which may only be considered for granting under Section 104 of the RMA if the requirements of section 104D of the RMA are deemed to have been met. Consents for non-complying activities will generally only be granted in exceptional circumstances.</p> <ul style="list-style-type: none"> • Allow submissions <p>Orion support the deletion of this clause as this clause sets a higher threshold than ordinarily applied to non-complying activities under the Resource Management Act.</p>
<p>Gelita (NZ) Limited C/- Mr Kevin Bligh Senior Planner Golder Associates (NZ) Limited P O Box 2281 Christchurch 8140</p>	<p>pCARP-813 PCARP-2926</p> <p>Rule 7.18</p>	Support	<p>Both Gelita and St Georges Hospital seek that Rule 7.18 be deleted.</p> <ul style="list-style-type: none"> • Allow submission <p>Orion supports the deletion of this provision, as the prohibited activity status removes the ability to carry our health risk assessments if necessary to demonstrate effects relative to the guidelines that are acceptable.</p>

St Georges Hospital C/-Mr Geoff Bluett Golder Associates (NZ) Limited P O Box 2281 Christchurch 8140			
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