

From: [Lynette Wharfe](#)
To: [Mailroom Mailbox](#)
Cc: [Eve Williams](#)
Subject: Proposed Air Plan
Date: Friday, 10 July 2015 1:15:28 p.m.
Attachments: [Further Submission on Proposed Canterbury Air Regional Plan.pdf](#)

Please find attached a further submission from Horticulture NZ on the Proposed Air Plan.

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Further Submission on Proposed Canterbury Air Regional Plan

(Closing date: Friday 10 July 2015)

To: Environment Canterbury
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Horticulture New Zealand represents horticultural growers in the Canterbury Region, so represents a relevant aspect of the public interest.

Horticulture New Zealand is not a trade competitor and would not gain any advantage through this further submission.

I do wish to be heard in support of my submission

If others make a similar submission, I **would not** be prepared to consider preparing a joint case with them at any hearing.



.....
Signature of person making submission or person authorised to sign on behalf of person making submission.

Date: 10 July 2015

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Mrs Jacki Wright	62960	pCARP-354	Introduction	Amend Introduction Outdoor Burning and Rural Discharges of contaminants as set out in submission including adding sentence about agricultural sprayers and powder spreaders	Oppose	The submission seeks wording that does not accurately reflect the activities referred to.
Selwyn District Council	63010	pCARP-387	Introduction	Amend Introduction Outdoor Burning and Rural Discharges of contaminants by deleting 'often results in nuisance effects' and replace with 'may result in nuisance effects'.	Support in part	The change to 'may' is supported as it better reflects the situation. However Horticulture NZ has sought deletion of 'nuisance effects' to be replaced with adverse effects.
Fonterra Co-op Group Ltd	63146	pCARP-696	Definitions	Definitions: Include a definition for ambient air quality as set out in the submission	Support	There needs to be clarity as to what is meant by ambient air quality and also a clear distinction between ambient and localised air quality. Definitions assist.
Lyttleton Port Company Ltd	63151	pCARP-779	Definitions	Definitions: Include a definition for earthworks as set out in the submission	Support in part	It needs to be clear that cultivation and other normal rural practices are not classed as earthworks.
Selwyn District Council	63010	pCARP-1111	Definitions	Definitions: Insert a definition for bulk solid materials as set out in the submission	Oppose in part	The definition sought is broad and all-encompassing and would include all fertiliser whether in a bulk form or not.
Christchurch City Council	52285	pCARP-2550	Definitions	Definitions: Insert a definition of nuisance	Oppose	It is not clear what definition the submitter seeks and Horticulture NZ has sought that 'nuisance' be deleted and replaced with adverse effects.
Carter Holt Harvey Pulp and Paper Ltd	63176	pCARP-2359	Objectives	Objectives: Insert a new objective: Industrial and rural activities are located within appropriate zones to recognise the benefits of these activities and provide for them, and to manage the adverse effects from air discharges on human health, property and environment.	Support	It needs to be clear that rural activities are recognised as appropriate and located in appropriate zones.
Carter Holt	63176	pCARP-2360	Objectives	Objectives: Insert a new objective:	Support	Conflicts between incompatible activities are a key issue –

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Harvey Pulp and Paper Ltd				Incompatible land uses and activities are adequately separated to avoid remedy or mitigate adverse effects of air discharges and reverse sensitivity conflicts.		demonstrated in the range of submissions on some sections of the pCARP. The plan needs to adequately address how these will be managed.
Fonterra Co-op Group Ltd	63146	pCARP-705	Objectives	Insert Objective 5.10: Manage localised air quality effects of individual discharges while recognising that individual discharges may have effects on ambient air quality	Support in part	The relationship between ambient and localised air quality in the Plan needs to be clarified.
Mobil NZ, BP Oil and Z Energy	53963	pCARP-3089	Objective 5.1	Amend Objective 5.1 by combining with Objective 5.2 and focus on Ambient air quality	Support	Combining the objectives and focusing on ambient air quality provides a clearer focus in the objectives.
Mobil NZ, BP Oil and Z Energy	53963	pCARP-3090	Objective 5.2	Amend Objective 5.2 by combining with Objective 5.1 and focus on Ambient air quality	Support	Combining the objectives and focusing on ambient air quality provides a clearer focus in the objectives.
Fonterra Co-op Group Ltd	63146	pCARP-707	Objective 5.9	Amend Objective 5.9 to apply to 'Discharges to air from new activities..'	Support	Amending the objective clarifies that the spatial location applies to new activities that are establishing.
Federated Farmers of NZ	63238	pCARP-3038	Policies	Insert a new policy Good management practice is adopted by rural activities that discharge odour, dust or smoke in the rural environment.	Support	A focus on good practice is supported.
Lowe Corporation Ltd and Colyer Mair Assets Ltd	63169	pCARP-2619	Policies	Insert a new policy: Where considering location of sensitive activities, avoid encroachment on existing activities discharging contaminants to ensure that land users are appropriately located.	Support	Conflicts between incompatible activities are a key issue – demonstrated in the range of submissions on some sections of the pCARP. The plan needs to adequately address how these will be managed
Meridian Energy Ltd	53283	pCARP-2695	Policy 6.1	Amend Policy 6.1 as set out in submission	Support	The changes sought provide greater clarity and is consistent with the RMA avoid, remedy or mitigate adverse effects.

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Fonterra Co-op Group Ltd	63146	pCARP-708	Policy 6.2	Amend Policy 6.2 so it is clearly linked to ambient air quality	Support	The policy needs to be clarified that it relates to ambient air quality.
Fonterra Co-op Group Ltd	63146	pCARP-709	Policy 6.3	Amend Policy 6.3 so it is clearly linked to ambient air quality	Support	The policy needs to be clarified that it relates to ambient air quality.
Fonterra Co-op Group Ltd	63146	pCARP-711	Policy 6.5	Delete Policy 6.5 and replace with: Avoid discharges into air that are assessed as causing offensive or objectionable effects in accordance with Schedule 2.	Oppose	The policy sought reads as a rule and effectively prohibits some activities. Policy 6.5 as notified sought that they be identified and managed.
Fonterra Co-op Group Ltd	63146	pCARP-712	Policy 6.6	Delete Policy 6.6 and replace with: Existing activities that discharge to air, including the re-consenting or expansion thereof, are to adopt the best practicable option to prevent or minimised actual or likely adverse effects on the environment so as to reduce the potential for reverse sensitivity effects.	Oppose	Proposed Policy 6.6 seeks to ensure activities are in appropriate locations and this is supported. The policy sought by the submitter changes the focus away from that policy approach.
Canterbury Aggregate Producers Group	63194	pCARP-3010	Policy 6.6	Delete Policy 6.6 and replace with: Where legally established discharges of contaminants to air occur, sensitive activities should avoid establishing in proximity to those activities.	Oppose in part/ support in part	The policy is supported to the extent that it incorporates how reverse sensitivity and incompatible activities should be managed. However Policy 6.6 should be retained and the wording sought added as an additional policy.
Selwyn District Council	63010	pCARP-1118	Policy 6.7	Delete Policy 6.7 and replace with reworded policy	Oppose in part	Policy 6.7 is not clear and a number of submitters seek rewording. Horticulture NZ has sought amended wording which sets out the presumptions relating to new activities locating near existing lawfully established activities.
Ballance Agri-Nutrients Ltd	63247	pCARP-2205	Policy 6.7	Delete Policy 6.7 and replace with reworded policy	Oppose in part	Policy 6.7 is not clear and a number of submitters seek rewording. Horticulture NZ has sought amended wording which sets out the presumptions relating to new activities locating near existing lawfully established activities. Any

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						change should apply to rural land uses as well as industry.
Selwyn District Council	63010	pCARP-1121	Policy 6.10	Amend Policy 6.10 as set out in the submission	Support	The amendments sought to Policy 6.10 provide a better wording in terms of adopting best practicable option.
Federated Farmers of NZ	63238	pCARP-3039	Policy 6.13	Amend Policy 6.13 by adding 'such as burning of infected plant or animal material, including animal carcasses'	Oppose in part	It is not just burning that may discharge to air as a result of a biosecurity risk so the policy should not be limited.
Ms Shirley Harris	5484	pCARP-1032	Outdoor burning	Amend policies to prohibit outdoor burning in rural and urban areas during all months of the year	Oppose	Outdoor burning in rural areas based on good management practices should be provided for as adverse effects can be avoided remedied or mitigated as provided for in the RMA.
Federated Farmers of NZ	63238	pCARP-3043	Outdoor burning	Insert a new policy to provide an alternative management strategy for addressing the effects of crop residue burning that is based on the Ashburton DC/ Federated Farmers Crop Residue burning COP.	Support	Outdoor burning of crop residue in rural areas based on good management practices should be provided for as adverse effects can be avoided remedied or mitigated as provided for in the RMA.
Mr Ben Ede	58433	pCARP-3144	Outdoor burning	Delete policies and rules to prohibit outdoor burning in rural areas and replace with provisions that prohibit rural burning of crop and other vegetation.	Oppose	Outdoor burning in rural areas based on good management practices should be provided for as adverse effects can be avoided remedied or mitigated as provided for in the RMA.
Selwyn District Council	63010	pCARP-1126	Policy 6.16	Amend Policy 6.16 as set out in the submission	Support in part	The focus on adverse effects is supported.
Federated Farmers of NZ	63238	pCARP-3041	Policy 6.17	Amend Policy 6.17 by deleting 'particularly were Crop Residue Burning Buffer Areas have been identified in Section 9 Maps.	Support in part	Outdoor burning of crop residue in rural areas based on good management practices should be provided for as adverse effects can be avoided remedied or mitigated as provided for in the RMA.
Orion NZ Ltd	63246	pCARP-3041	New Policy	Insert new policy: Provide for diesel electricity generation to ensure a resilient regional and local electricity network during emergency events.	Support in part	Provision for use of generators in emergencies is supported but shouldn't be limited to regional and local electricity networks.

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Ravensdown Fertiliser Co-op Ltd	56708	pCARP-2765	New Policy	Insert a new policy 6.19B relating to changes of land use patterns and impacts on existing activities	Support	There needs to be recognition of existing uses and ensure that they are not constrained by reverse sensitivity effects.
Ravensdown Fertiliser Co-op Ltd	56708	pCARP-2768	Policy 6.21	Amend Policy 6.21 to include 'remedy or mitigate' and delete reference to Ambient Air Quality Guidelines	Support	The changes sought are consistent with the RMA.
Selwyn District Council	63010	pCARP-1133	Policy 6.26	Amend Policy 6.26 to specifically exclude agrichemicals and fertilisers.	Support	Agrichemicals and fertilisers are addressed in Policy 6.25 so Policy 6.26 should apply to rural activities other than agrichemicals and fertilisers
Canterbury District Health Bd	62395	pCARP-540	Rules 7	Require that dust/ smoke/ odour management plans in permitted activity rules be independently audited	Oppose	The plans are required to be provided to CRC on request. It is unnecessary compliance to require them to be independently audited.
Canterbury District Health Bd	62395	pCARP-565	Rules 7	Require that dust/ smoke/ odour management plans in rules be independently audited	Oppose	The plans are required to be provided to CRC on request. It is unnecessary compliance to require them to be independently audited.
G & T Essenberg	62811	pCARP-325	Rules 7	Require greenhouse gas reduction targets	Oppose	Greenhouse gas emission reductions is the responsibility of central government.
Selwyn District Council	63010	pCARP-1138	Rule 7.3	Add to rule 'except where provided for under a separate rule'	Support	The addition clarifies that other rules may take precedence over 7.3.
Lowe Corporation Ltd and Colyer Mair Assets Ltd	63169	pCARP-2627	Rule 7.3	Amend Rule 7.3 to focus on sensitive activities and make discretionary activity	Support	The focus on sensitive activities is more effects based.
Mr Ben Ede	58433	pCARP-91	Outdoor burning	Delete policies and rules to prohibit outdoor burning in rural areas and replace with provisions that prohibit rural burning of crop and other vegetation.	Oppose	Outdoor burning in rural areas based on good management practices should be provided for as adverse effects can be avoided remedied or mitigated as provided for in the RMA.
Mr Matthew Green	62961	pCARP-467	Outdoor burning	Insert new rule to prohibit outdoor burning in rural areas	Oppose	Outdoor burning in rural areas based on good management practices should be provided for as adverse effects can be avoided remedied or mitigated as provided for in the RMA.
Ms Shirley Harris	5484	pCARP-1033	Outdoor	Amend rules to prohibit outdoor burning	Oppose	Outdoor burning in rural areas based on good management

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			burning	in rural and urban areas during all months of the year		practices should be provided for as adverse effects can be avoided remedied or mitigated as provided for in the RMA.
Mr Matthew Green	62961	pCARP-1967	Outdoor burning	Amend Crop residue Burning Buffer areas to require no crop residue burning within 2 kms of a residential zone	Oppose	An arbitrary distance is not effects based.
Ashburton District Council	62940	pCARP-877	Rule 7.5	Amend Rule 7.5 to discretionary activity	Support	A discretionary activity provides the ability to assess the effects of the activity.
Mr Neil Barton	62902	pCARP-332	Rule 7.8	Amend Rule 7.8 as set out in the submission	Support in part	The approach sought to crop residue burning is more effects based.
Federated Farmers of NZ	63238	pCARP-3058	Rule 7.8	Delete 'standing' from Rule 7.8	Oppose in part	The effects of standing and cut crop residue are different.
Federated Farmers of NZ	63238	pCARP-3059	Rule 7.8	Amend Condition 1 of Rule 7.8	Support	The approach sought to crop residue burning is more effects based.
Ashburton District Council	62940	pCARP-883	Rule 7.9	Amend Rule 7.9 so that consents apply for multiple burns over a period of time	Support	The approach would avoid the need for repeat consent applications.
Mr Neil Barton	62902	pCARP-1857	Rule 7.9	Amend Rule 7.9 as set out in the submission	Support in part	The approach sought to crop residue burning is more effects based.
Federated Farmers of NZ	63238	pCARP-3062	Rule 7.8	Delete 'standing' from Rule 7.8	Oppose in part	The effects of standing and cut crop residue are different.
Mr Vincent Scully	58706	pCARP-127	Rule 7.10 (2)	Increase setback to 500m	Oppose	The setback is not effects based.
Mr Vincent Scully	58706	pCARP-128	Rule 7.10 (3)	Increase setback to 500m	Oppose	The setback is not effects based.
Mr Vincent Scully	58706	pCARP-129	Rule 7.10 (4-6)	Require burning receptacle with stack height to	Oppose	The approach would not provide for outdoor burning which should be able to be undertaken using best management practices.
Clearwater Firewood	63113	pCARP 993	Rule 7.10 (3)	Amend to require 6 months drying time before burning	Oppose	The approach is not effects based.
Selwyn District Council	63010	pCARP-1141	Rule 7.10 (3)	Amend to require vegetation to be dry before burning	Support	The approach is more effects based.
Federated Farmers of NZ	63238	pCARP-3069	Rule 7.10 (1)	Delete 'standing' from Rule 7.10	Oppose in part	The effects of standing and cut crop residue are different.

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Federated Farmers of NZ	63238	pCARP-3072	Rule 7.10 (6)	Amend requirements for smoke management plan	Support in part	The smoke management plan should be linked to the size, nature and timing of fire.
Ashburton District Council	62940	pCARP-912	New Rule	Insert a new rule following 7.72 to provide for small scale applications using hand held appliances by property owners with the provision that agrichemicals are to be use in accordance with manufacturer's directions. The new rule should only require applications consistent with NZS8409:2009 certification if the applications are undertaken by a licensed operation. As in NRRP Rule AQL 70 the new rule should provide for the application of agrichemicals without nationally accredited qualifications by owners on roadsides adjacent to their property.	Oppose in part	Those applying agrichemicals in public places, such as roadsides, should be appropriately trained to ensure that the risk of adverse effects are minimised.
Meridian Energy	53283	pCARP -2758	New rule	Insert a new rule to apply to Pest control activities wider than rural activities as set out in the submission, including vertebrate toxic agents	Support in part	Provision for application of vertebrate toxic agents is supported but should also ensure that best practice is required for the application.
Ballance AgriNutrients	63247	pCARP-2284	Rule 7.74	Amend Rule 7.74 (Restricted Discretionary Rule) to include fertilisers and adoption of industry best practice	Support in part	Application of fertiliser not meeting the permitted activity rule should be provided for as a restricted discretionary rule but it should be a separate rule from agrichemicals as the matters of discretion are different to those for agrichemicals.
Ravensdown Fertilisers Co-op Ltd	56708	pCARP-2808	Rule 7.74	Amend Rule 7.74 (Restricted Discretionary Rule) to include fertilisers	Support in part	Application of fertiliser not meeting the permitted activity rule should be provided for as a restricted discretionary rule but it should be a separate rule from agrichemicals as the matters of discretion are different to those for agrichemicals.

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Mobil NZ, BP Oil and Z Energy	53963	pCARP-3124	New rule Industrial, trade and large scale discharges to air	Insert new rule for activities that do not meet permitted activity conditions to default to discretionary status	Support	The approach is effects based.