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**Cc:** [Mailroom Mailbox](#)  
**Subject:** Silver Fern Farms further submission on proposed Canterbury Air Regional Plan  
**Date:** Friday, 10 July 2015 2:34:03 p.m.  
**Attachments:** [Silver Fern Farms further submission on proposed Canterbury Air Regional Plan 10 July 2015.pdf](#)

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Dear Sir/Madam

Please find attached a set of further submissions on Environment Canterbury's proposed Canterbury Air Regional Plan – lodged by Silver Fern Farms on 10 July 2015.

Kind regards,  
Martina Armstrong

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**Martina  
Armstrong**

Environmental Advisor

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**Environment Canterbury  
PO Box 345  
CHRISTCHURCH 8140**

**mailroom@ecan.govt.nz**

**10 July 2015**

Dear Sir / Madam

**RE: SILVER FERN FARMS FURTHER SUBMISSION ON THE PROPOSED  
CANTERBURY AIR REGIONAL PLAN 2015**

Please find attached Silver Fern Farms' further submission on the Proposed Canterbury Air Regional Plan. Silver Fern Farms makes this further submission as a person who has an interest in the plan change greater than the interest that the general public has in accordance with Clause 8(1)(b) of the First Schedule of the Resource Management Act 1991.

Silver Fern Farms submitter ID number is 63233.

In preparing this submission, Silver Fern Farms is not aware of anything by which it could gain an advantage in trade competition.

Silver Fern Farms does wish to be heard in support of this submission and would be prepared to consider presenting its submission in a joint case with others making a similar submission at the hearing.

Please feel free to contact Martina Armstrong, Environmental Advisor, on 027 532 9751 or email at [martina.armstrong@silverfernfarms.co.nz](mailto:martina.armstrong@silverfernfarms.co.nz) if you have any questions regarding this submission.

Yours faithfully,

**Daryn Jemmett  
Group Environmental Manager  
Silver Fern Farms Limited**



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| 1) I support or oppose the submission of:  | 2) The particular parts of the submission I support or oppose are: | 3) The reasons for my support or opposition are:   | 4) Support or oppose  |
|--|--|--|---|
| <i>Name and postal address of original submission</i>  | <i>Submission on point reference number</i>                        | <i>Provide reason for support or opposition</i>  | <i>Note support or oppose</i>   |
| Horticulture New Zealand<br>C/- Natural Resources and Environment<br>PO Box 10-232<br>Wellington 6143        | pCARP-1072, Policy 6.6   | Industry needs to be protected from reverse sensitivity. It is important that district plans protect the zones that cater for industrial activities that discharge to air. Activities that are sensitive to discharges to air from industrial activity should not be located near industrial zoned land. | Support in part <ul style="list-style-type: none"> <li>• support theme</li> </ul> |
|  | pCARP-1084, Rule 7.3   | The discharge of odour, dust or smoke into air that is offensive or objectionable beyond the boundary of origin when assessed in accordance with Schedule 2 should be a discretionary activity, not non-complying. Air discharges should be assessed on a case-by-case basis.                            | Support   |
| Lowe Corporation Limited and Colyer Mair Assets Limited<br>PO Box 444<br>Hastings 4156<br>Attn: Amber Davies | pCARP-2619, Policy 6.6   | Industry needs to be protected from reverse sensitivity. It is important that district plans protect the zones that cater for industrial activities that discharge to air. Activities that are sensitive to discharges to air from industrial activity should not be located near industrial zoned land. | Support in part <ul style="list-style-type: none"> <li>• support theme</li> </ul> |
|  | pCARP-2627, Rule 7.3   | Making this activity non-complying is unduly restrictive. Buffer zones play an important role.   | Support in part <ul style="list-style-type: none"> <li>• support theme</li> </ul> |



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|---|-------------------------------------|--|-----------------|
| Ravensdown Fertiliser Co-operative Limited<br><br>PO Box 51-282<br>Tawa<br>Wellington 5249                                  | pCARP-2733, Policy 6.6              | Basic policy test appears to have been met. Policy 6.6 should not be deleted.  | Oppose          |
|   | pCARP-2773, Rule 7.3                | Rule should include discretionary activity rather than non-complying.  | Support         |
|   | pCARP-2776, Rule 7.14               | Clarification of Rule 7.14 is required.  | Support in part |
|   | pCARP-2779, Rule 7.18               | Use of AAQG as a regulatory trigger that may impact lawfully established operations as a prohibited activity is inappropriate.   | Support in part |
|   | pCARP-2780, Rule 7.28               | Rule 7.28 should refer to objectionable and offensive odour, as opposed to any odour. The Rule currently implies that any odour beyond the boundary of the property of origin requires resource consent. | Support         |
| Gelita (NZ) Limited<br>C/- Kevin Bligh<br>Senior Planner Golder Associates (NZ) Limited<br>PO Box 2281<br>Christchurch 8140 | pCARP-2925, Rule 7.14               | This rule is more onerous in requirements than the NESAQ.  | Support in part |
|   | pCARP-2926, Rule 7.18               | Use of AAQG as a regulatory trigger that may impact lawfully established operations as a prohibited activity is inappropriate.   | Support in part |
|   | pCARP-2933, Rule 7.28<br>pCARP-2934 | Rule 7.28 should refer to objectionable and offensive odour, as opposed to any odour. The Rule currently implies that any odour beyond the boundary of the property of origin requires resource consent. | Support in part |



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|--|--------------------------|---|---------|
| Lyttelton Port Company Limited<br>Private Bag 5601<br>Lyttelton 8841 | p-CARP-782, Rule 7.36(2) | Engineering workshops at industrial premises generally are unfiltered. Requiring these to be filtered and tested is excessive when the emissions from these sources are generally low velocity and localised to within the industrial property. | Support |
|--|--------------------------|---|---------|

