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**Subject:** Proposed Canterbury Air Regional Plan - Further Submission from St George's Hospital Incorporated  
**Date:** Friday, 10 July 2015 3:06:13 p.m.  
**Attachments:** [1529544\\_002\\_L\\_Rev0\\_St George's\\_63131\\_pCARP\\_Further\\_Subs\\_FINAL.pdf](#)

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Please find attached further submissions in relation to the Proposed Canterbury Air Regional Plan on behalf of St George's Hospital Incorporated.

Regards, Carmen (on behalf of Jeff Bluett)

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**FURTHER SUBMISSIONS ON  
PROPOSED CANTERBURY AIR REGIONAL PLAN  
BY ST GEORGE'S HOSPITAL INCORPORATED<sup>1</sup> (SUBMITTER NO. 63131)**

**To:** **Emailed to: mailroom@ecan.govt.nz**  
Further Submissions to Proposed Canterbury Air Regional  
Plan  
Environment Canterbury  
PO Box 345  
Christchurch 8140

**Name of further submitter:** St George's Hospital Incorporated (Submitter No. 63131)  
Private Bag 4737  
Christchurch Mail Centre  
Christchurch 8140

**1.0 These are further submissions in relation to submissions on the following proposed plan:**

Proposed Canterbury Air Regional Plan, hereafter referred to as the CARP.

**2.0 St George's Hospital Incorporated is a person who has an interest in the CARP that is greater than the interest the general public has for the following reasons:**

- 2.1 St George's Hospital Incorporated (St George's) is located in Christchurch city and offers care for surgical, medical and maternity patients mostly from the private sector. St George's is one of the largest private hospitals in New Zealand and one of the most modern in terms of equipment and technology. In order to be able to deliver its services, St George's facilities currently use a number of boilers that supply hot water for space heating and steam, and generators to supply electricity to the hospital during emergency situations. The generators also have the ability to load-shed during the hours of 06:00 to 21:00 during winter months. The boilers and generators discharge contaminants to air and therefore the provisions of the CARP have the potential to impact on St George's current and future operations.
- 2.2 St George's made submissions on the CARP including on matters to which these further submissions relate.
- 2.3 As provisions in the CARP relate directly to aspects of its operations, St George's seeks to ensure continuity of its operations by ensuring that the provisions of the CARP do not adversely impact on its ability to continue to utilise boilers and generators at the hospital without undue constraint.

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<sup>1</sup> St George's Hospital Limited is a subsidiary of the part St George's Hospital Incorporated. St George's Hospital Incorporated is the appropriate organisation to submit on the Proposed Canterbury Air Regional Plan.

**3.0 The specific submissions to the CARP that St George’s further submissions relate are outlined in the attached table.**

3.1 In summary, the reasons for St George’s further submissions are:

- (a) Ensuring that the provisions of the CARP provide a resource management framework that enables St George’s to continue to utilise its boilers and generators, without undue constraint, while continuing to ensure that mechanisms are in place that ensure that significant effects of these discharges are avoided, remedied or mitigated. This approach enables St George’s to continue to operate, which in turn enables it to provide for the broader community’s economic, social and cultural well-being.
- (b) Ensuring that the CARP appropriately reflects the requirements of the Resource Management Act 1991, higher level statutory planning documents such as the Canterbury Regional Policy Statement (CRPS) and associated technical tools (e.g., Ambient Air Quality Guidelines 2002).

**4.0 Additional matters – corrections in the summary of submissions for CARP as they relate to St George’s submission.**

4.1 The Canterbury Regional Council’s summary of submissions, in relation to three of St George’s specific submissions, has not correctly summarised the submission and/or the decision sought. They are:

- (a) **Objective 5.6.** St George’s submission was **not** summarised in the summary of submissions.

**St George’s submission is:**

This objective recognises that a range of development and technological innovations may be able to provide solutions for any air quality issues, and therefore this potential is to be recognised and provided for.

The intent of this objective is **supported**, although the current wording is difficult to understand. For this reason, amendments are proposed which it is considered reflect the intended purpose of this objective.

**Decision sought** is - amend Objective 5.6 as follows:

*“Developments and innovation in technology ~~are enabled to~~ which have the potential to provide solutions to air quality issues are to be recognised and appropriately provided for.”*

- (b) **Policy 6.8** (Sub. Ref. pCARP-783). St George’s submission sought an amendment to this policy. The summary does not accurately summarise the decision sought, in that some of the deletions sought are identified as proposed insertions. The decision sought by St George’s is provided below, with grey shading identifying the correct wording:

*“Where activities that discharge into air locate appropriately and where the effects of the discharge are avoided, remedied or mitigated to avoid the potential for reverse sensitivity effects, then a longer consent duration ~~may be available~~ is appropriate to provide for ongoing operational certainty.”*

- (c) **Policy 6.12** (Sub. Ref. pCARP-786 and pCARP-787). St George’s sought the deletion of this policy. The summary of submission accurately reflects this request, but does so with two identical submission references (rather than the one required).

5.0 St George's wishes to be heard in support of this further submission.

**Submitter:** St George's Hospital Incorporated

**Signed for and  
on behalf of the  
Submitter:**

A handwritten signature in black ink, appearing to read 'J G Bluett', written in a cursive style.

**Golder Associates (NZ) Limited**  
Jeff Bluett  
Senior Air Quality Scientist

**Date:** 10 July 2015

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Further Submissions of St George's Hospital Incorporated (Submitter No. 63131) to the Proposed Canterbury Air Regional Plan

Submission of	Part of the submission	Reason	Support / Oppose
<b>General</b>			
Carter Holt Harvey Pulp & Paper Limited (Submitter No. 63176)	CARP – General (pCARP-2367)	The submitter requests the insertion of provisions to avoid the CARP requiring immediate and uneconomic adoption of new plant or equipment without, in effect, consideration of the economic impacts on companies. Investing in any new plant or equipment is a capital cost for organisations. Unless that cost is already factored into St George's budgets, paying for any such requirements if they need to be implemented in a short timeframe is likely to impact on other areas of St George's operations or affect its ability to operate at all.	Support
<b>Section 1 - Introduction</b>			
Fonterra Co-operative Group Limited (Submitter No. 63146)	Introduction – The statutory planning framework (pCARP-693)	The CARP fails to identify that the CRPS distinguishes between ambient and localised air quality effects. The CARP, in giving effect to the CRPS needs to distinguish between these effects, including in relation to reverse sensitivity considerations. The amendment requested by the submitter assists in providing this necessary distinction.	Support
<b>Section 2 – Definitions and Interpretation</b>			
Fonterra Co-operative Group Limited (Submitter No. 63146)	New "Ambient air quality" definition (pCARP-696)	The CARP, as currently drafted, does not refer to ambient air quality. St George's, in its submissions, requested a number of amendments, including inserting references to ambient air quality. Given these requests, it is appropriate to also include a definition of ambient air quality in the CARP.	Support
Horticulture New Zealand (Submitter No. 63138)	New definitions for "ambient air quality" and "localised air quality" (pCARP-1079)	The CARP, as currently drafted, does not differentiate between 'ambient air quality' and 'localised air quality'. Various submissions, including St George's have requested amendments that would provide this differentiation. Given these requests, it is appropriate to provide definition for these two terms.	Support
<b>Section 5 - Objectives</b>			
Fonterra Co-operative Group Limited (Submitter No. 63146)	New objective (Objective 5.10) (pCARP-705)	The submitter requests a new objective that aims to manage the localised air quality effects associated with individual discharges to air, while recognising that these individual discharges may also have effects on ambient air quality. This objective reflects the approach accommodated within the CRPS. It is important that the focus of the CARP in relation to discharges to air, such as those from St George's boilers and generators, is that any localised effects of discharges are able to managed (i.e., avoided, remedied or mitigated).	Support
Horticulture New Zealand (Submitter No. 63138)	Objective 5.3 (pCARP-1066)	The amendments requested by the submitter reflect the provisions of section 5 of the Resource Management Act 1991 (RMA) to safe-guard the life-supporting capacity of air.	Support

Further Submissions of St George's Hospital Incorporated (Submitter No. 63131) to the Proposed Canterbury Air Regional Plan

Submission of	Part of the submission	Reason	Support / Oppose
Canterbury District Health Board (Submitter No. 62935)	Objective 5.7 (pCARP-532)	To clarify the intent of the objective, the submitter requests that clarification is provided in terms of what is considered to be regionally significant infrastructure. St George's, in its submission (pCARP-766), requested that the objective be amended to also refer to critical infrastructure, which includes health care services which also contribute to the region's economic, cultural and social wellbeing. Based on the amendment sought by the submitter, as well as St George's submission, it is considered that clarity needs to be provided within this objective as to what is significant and/or critical infrastructure.	Support in part
Fonterra Co-operative Group Limited (Submitter No. 63146)	Objective 5.8 (pCARP-706)	The submitter requested retention of this objective on the basis that it recognises that there are differing air quality expectations in different locations. This objective recognises that activities that discharge to air need to be considered in light of the sensitivity of the local environment, including separation to any sensitive receptors. This is an appropriate resource management approach.	Support
<b>Section 6 - Policies</b>			
Mobil New Zealand Limited, BP Oil New Zealand Limited, and Z Energy Limited (Submitter No. 53963)	Policy 6.2 (pCARP-3110)	The submitter requests that Policies 6.2 and 6.3 are replaced with a policy that requires that discharges to air are managed to ensure compliance with the Ambient Air Quality Guidelines 2002 (AAQG). The AAQG are guidelines developed as a means of managing ambient air quality, not discharges to air. In addition, as guidelines, not standards, they are not intended to act as an absolute compliance requirement.	Oppose
Mobil New Zealand Limited, BP Oil New Zealand Limited, and Z Energy Limited (Submitter No. 53963)	Policy 6.3 (pCARP-3111)	The submitter requests that Policies 6.2 and 6.3 are replaced with a policy that requires that discharges to air are managed to ensure compliance with the Ambient Air Quality Guidelines 2002 (AAQG). The AAQG are guidelines developed as a means of managing ambient air quality, not discharges to air. In addition, as guidelines, not standards, they are not intended to act as an absolute compliance requirement.	Oppose
<b>Section 7 - Rules</b>			
Mr Alan Garrick Wright (Submitter No. 63115)	Industrial, trade and large scale discharges to air (pCARP-1012)	The submitters requests that the rules identify that the discharges to air from hospitals (and freezing works) are monitored 24 hours a day and seven days a week. Monitoring requirements for any particular discharge needs to be determined based on the nature of effects, the sensitivity of the receiving environment, the mitigation measures in place and the appropriateness or otherwise of the proposed monitoring (i.e., what is it saying). A default requirement to monitor all the time is not appropriate.	Oppose

**ATTACHMENT A – SCHEDULE AND CONTACT DETAILS FOR SUBMITTERS**

Note: If an email address is available then it will be used to provide a copy of this further submission to the submitter.

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