

From: [Chris Hansen](#)
To: [Mailroom Mailbox](#)
Cc: [Shaun Burkett](#)
Subject: Proposed Canterbury Air Regional Plan - further submission to addendum submissions
Date: Wednesday, 5 August 2015 5:39:15 p.m.
Attachments: [RAV ECan Air Plan final further submission on addendum 050815.docx](#)

EC357068

Please find attached a further submission on behalf of Ravensdown Fertiliser Cooperative Ltd to a submission by Fonterra included in the addendum to the Summary of Decisions Requested Report Notified on 27 June 2015. Further submissions close 5pm Thursday 6 August 2015.

Please contact me in the first instance if you have any questions.

Regards

Chris Hansen
RMA Planning Consultant/Company Director
Chris Hansen Consultants Ltd
P O Box 51-282
Tawa, Wellington 5249
ph: 02102645108



FURTHER SUBMISSION ON PROPOSED CANTERBURY AIR REGIONAL PLAN

(Closing date: 5pm Thursday 6 August 2015)

To: Chief Executive Officer
Environment Canterbury
P O Box 345,
Christchurch

Further Submission on: Proposed Canterbury Air Regional Plan – Addendum to
Summary of Decisions Request

Name of Submitter: Ravensdown Fertiliser Co-operative Ltd.

Address of Submitter: C/- CHC Ltd
PO Box 51-282
Tawa
WELLINGTON 5249
Attention: Chris Hansen

Phone: 021 026 45 108
Email: Chris@rmaexpert.co.nz

1. A detailed further submission is attached.
2. Ravensdown Fertiliser Co-operative Ltd (Ravensdown) is an organisation who has an interest in the variation that is greater than the interest the general public has.
3. Ravensdown wishes to be heard in support of this further submission.
4. Ravensdown would be prepared to consider presenting its submission(s) in a joint case with others making a similar submission at any hearing.



.....

Chris Hansen

Authorised Agent of Ravensdown Fertiliser
Co-operative Ltd

05 August 2015

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Date

Submitter ID/Name	Point ID	Plan Provision	Support/ Oppose	Reason
Fonterra Co-operative Group Limited	pCARP-721	Policy 6.21	Support	<p>The submitter seeks Policy 6.21 to be amended by deleting the first word 'Avoid' and replacing it with the following words: "<u>Manage any localised adverse effects from ...</u>". Ravensdown supports this submission request as it is consistent with its own submission and represents sound resource management practice.</p>

From: [Chris Hansen](#)
To: [Mailroom Mailbox](#)
Cc: [Shaun Burkett](#); [Murray Mackenzie](#); Peter.Hay@ravensdown.co.nz
Subject: ECan Proposed Air Regional Plan - further submission
Date: Friday, 10 July 2015 1:34:43 p.m.
Attachments: [RAV ECan Air Plan FINAL further submission 100715.pdf](#)

Please find attached a further submission on behalf of Ravensdown Fertiliser Co-operative Ltd to submissions received by ECan to the Proposed Air Regional Plan.

Please contact me in the first instance if you have any questions.

Regards

Chris Hansen
RMA Planning Consultant/Company Director
Chris Hansen Consultants Ltd
P O Box 51-282
Tawa, Wellington 5249
ph: 02102645108



FURTHER SUBMISSION ON PROPOSED CANTERBURY AIR REGIONAL PLAN

(Closing date: 5pm Friday 10 July 2015)

To: Chief Executive Officer
Environment Canterbury
P O Box 345,
Christchurch

Further Submission on: Proposed Canterbury Air Regional Plan

Name of Submitter: Ravensdown Fertiliser Co-operative Ltd.

Address of Submitter: C/- CHC Ltd
PO Box 51-282
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Attention: Chris Hansen

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3. Ravensdown wishes to be heard in support of this further submission.
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.....
Chris Hansen
Authorised Agent of Ravensdown Fertiliser
Co-operative Ltd

10 July 2015

.....
Date

Submitter ID/Name	Point ID	Plan Provision	Support/ Oppose	Reason
New Zealand Manufacturers and Exporters Association	pCARP-249	Proposed Canterbury Air Regional Plan	Support in part	The submitter seeks to amend the Proposed Plan so the drive to "best practice" is expressed rather as "common or normal" practice. Ravensdown supports the submitter's request for the Proposed Plan to move away from the term 'best practice' but prefers the term 'good management practice' as the alternative as this is consistent with industry used terminology.
	pCARP-251	Proposed Canterbury Air Regional Plan	Support	The submitter seeks to amend the Proposed Plan to ensure that management of emissions is based on realistic assessments of pollution sources. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
	pCARP-270	Proposed Canterbury Air Regional Plan	Support	The submitter seeks to amend the Proposed Plan to recognise that conditions after the earthquakes have distorted PM ₁₀ levels, and dust should be segregated from the combustion product assessment. Ravensdown supports this submission as it agrees with the matters raised, is consistent with its own submission, and represents sound resource management practice.
GL Bowron and Co Ltd	pCARP-1274	Proposed Canterbury Air Regional Plan	Support	The submitter seeks the withdrawal of the section 32 report and replaces it with a section 32 report that has been developed using principles for assessing the effectiveness of the proposals (principles outlined in submission). Ravensdown supports this submission as it is consistent with its own submission and represents good resource management practice.
Bathurst Resources Limited	pCARP-2221	Proposed Canterbury Air Regional Plan	Oppose	The submitter seeks to amend all sections of the pCARP, including schedules that relate to PM _{2.5} to acknowledge that there are no guideline values currently applicable in New Zealand relating to discharges of PM _{2.5} . Ravensdown opposes the request to introduce schedules that relate to PM _{2.5} in the absence of guidelines values as it considers it is inappropriate to include any reference to PM _{2.5} in the pCARP, as discussed in its own submission.
Fonterra Co-operative Group Limited	pCARP-693	Introduction1	Support	The submitters seeks to amend the last bullet point in " Statutory planning framework" of the Introduction section on page 1-7, by adding to the end of the bullet point the phrase: "... including the avoidance of reverse sensitivity effects on existing activities discharging to air". Ravensdown

				supports this submission as it agrees with the concern raised, is consistent with its own submission and represents sound resource management practice.
Horticulture New Zealand	pCARP-1056	Introduction1	Support	The submitter seeks to amend "Working with Key Partners", "Territorial Authority" in the Introduction section as follows: <i>"Potential for reverse sensitivity effects should be assessed as part of land use change or subdivision, particularly in the rural areas."</i> Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Bathurst Resources Limited	pCARP-2229	Introduction1	Support	The submitters seeks to amend "Industrial and large scale discharges of contaminants" in the Introduction section to acknowledge that while industrial sources make up a proportion of the contaminants in Canterbury, this proportion is similar to that of motor vehicles, and that the greatest source of contaminants is from domestic sources. Ravensdown supports this submission as it agrees with the issue raised, is consistent with its own submission and represents sound resource management practice.
Horticulture New Zealand	pCARP-1065	General Definitions Table 2.1	Support	The submitter seeks a definition of 'reverse sensitivity' to be included in the pCARP, and suggests a definition. Ravensdown supports this submission as it agrees that a definition has planning merit and represents sound resource management practice.
Waimakariri District Council	pCARP-1312	General Definitions Table 2.1	Support in Part; Oppose in Part	The submitter seeks a definition of 'bulk solid materials' to be included in the pCARP, and suggests a definition. Ravensdown supports the inclusion of a definition has planning merit. However, Ravensdown opposes part of the wording proposed and in particular the term: <i>"...include all materials consisting of fragments or particles that could be discharged as dust or particulate..."</i> which should be deleted.
Silver Fern Farms Ltd	pCARP - 2445	General Definitions Table 2.1	Oppose	The submitter seeks clarification in the definition of "fertiliser" whether there is intention to include land-based irrigation of processing wastewater. Ravensdown opposes the suggestion that fertiliser would include land-based irrigation of processing wastewater which is an activity and not a product.
Canterbury Aggregate Producers Group	pCARP-3019	General Definitions Table 2.1	Support	The submitter seeks a definition of "Regionally Significant Activities". Ravensdown supports this submission as it agrees that a definition has planning merit and represents sound resource management practice.
Fonterra Co-operative Group	pCARP-702	How the Plan Works3	Support	The submitter seeks to delete the following text from the description of non-

Limited				complying activities under paragraph 3, bullet point 5, page 3-2: Consents for non-complying activities will generally only be granted in exceptional circumstances. Ravensdown supports this submission as it agrees with the concerns raised and the deletion represents sound resource management practice.
Ballance Agri-Nutrients Limited	pCARP-2182	Objectives5	Support in Part/Oppose in Part	The submitter seeks a new objective as follows: <i>“Provide for industry and trade activities that rely on operational air discharges and that operate in accordance with industry best practice.”</i> Ravensdown supports the first part of the new objective <i>“Provide for industry and trade activities that rely on operational air discharges...”</i> as it is consistent with its own submission and represents sound resource management practice. However, Ravensdown opposes the use of the term ‘best practice’ in the second part of the new objective but prefers the term ‘good management practice’ as the alternative as this is consistent with industry used terminology.
Carter Holt Harvey Pulp & Paper Ltd	pCARP-2356	Objectives5	Support	The submitter seeks a new objective as follows: <i>“The operational requirements of heavy industry and other location specific industry is recognised and provided for.”</i> Ravensdown supports this submission as it is consistent with its own submission and represents good resource management practice.
Carter Holt Harvey Pulp & Paper Ltd	pCARP-2360	Objectives5	Support	The submitter seeks a new objective as follows: <i>“Incompatible land uses and activities are adequately separated to avoid, remedy or mitigate adverse effects of air discharges, and reverse sensitivity conflicts.”</i> Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Mrs Molly Melhuish	pCARP-2439	Objective 5.2	Oppose	The submitter seeks to amend Objective 5.2 to include the definition of air quality as including/reflecting cumulative exposure to PM _{2.5} . Ravensdown opposes this submission as the amendment sought is unnecessary and inappropriate and does not represent sound resource management practice.
TIM Nominees Limited	pCARP-2669	Objective 5.7	Support	The submitter seeks industrial activities to be added to Objective 5.7. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Alliance Group Limited	pCARP-2959	Objective 5.7	Support	The submitter seeks to amend Objective 5.7 to also recognise industry and its benefits to the economic, cultural and social wellbeing of the community. Ravensdown supports the matters raised in this submission as it represents sound resource management practice.

Horticulture New Zealand	pCARP-1068	Objective 5.8	Support	The submitter seeks to amend Objective 5.8 as follows: “ <i>Manage air quality to reflect the different receiving environments across the region, taking into account the location and characteristics of the background receiving environment.</i> ” Ravensdown supports this submission as it agrees with the matters raised, is consistent with its own submission, and represents sound resource management practice.
TIM Nominees Limited	pCARP-2668	Policies6	Support	The submitter seeks a sub-policy to Policy 6.19 addressing reverse sensitivity issues. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Selwyn District Council	pCARP-1123	Central Policies Applying to All Activities	Support	The submitter seeks an additional policy that recognises the contribution of local infrastructure to the economic, social cultural wellbeing and health of communities. Ravensdown supports this submission as it agrees an additional policy is necessary and represents sound resource management practice.
Bathurst Resources Limited	pCARP-2226	Central Policies Applying to All Activities	Support in Part	The submitter seeks the deletion of policies that delete discharges of PM _{2.5} . Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Straterra Inc.	pCARP-2752	Central Policies Applying to All Activities	Support in Part	The submitter seeks the deletion of policies that delete discharges of PM _{2.5} . Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Winstone Wallboards Limited, a division of Fletcher Building	pCARP-2160 pCARP-2164	Policy 6.2/Policy 6.3	Support in Part/Oppose in Part	The submitter seeks the deletion of the reference to Ambient Air Quality Guidelines 2002 Update in Policy 6.2 and replace with NESAQ Standards, or refer to the NESAQ as well as any values in the Ambient Air Quality Guidelines 2002 update that are not covered by NESAQ. Ravensdown supports the deletion of the reference to the AAQG 2002 and this is consistent with its own submission and represents sound resource management practice. However, Ravensdown opposes the amendment to Policy 6.2 as it is inconsistent with its own submission and does not represent sound resource management practice.
Fletcher Building Ltd	pCARP-2324 pCARP-2325	Policy 6.2/Policy 6.3	Support in Part/Oppose in Part	The submitter seeks the deletion of the reference to Ambient Air Quality Guidelines 2002 Update in Policy 6.2 and replace with NESAQ Standards, or refer to the NESAQ as well as any values in the Ambient Air Quality Guidelines 2002 update that are not covered by NESAQ. Ravensdown supports the deletion of the reference to the AAQG 2002 and this is

				consistent with its own submission and represents sound resource management practice. However, Ravensdown opposes the amendment to Policy 6.2 as it is inconsistent with its own submission and does not represent sound resource management practice.
Molly Melhuish	pCARP-432	Policy 6.4	Oppose	The submitter seeks to amend Policy 6.4 to require PM _{2.5} to be the primary target source, and the concentration target to be met at an earlier date. Ravensdown opposes the amendment to Policy 6.4 as it is inappropriate and unnecessary, inconsistent with its own submission, and does not represent sound resource management practice.
Fonterra Co-operative Group Limited	pCARP-721	Policy 6.6	Support	The submitter seeks the deletion of Policy 6.6 and its replacement with a new policy provided. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Canterbury Development Corporation	pCARP-506	Policy 6.7	Support	The submitter seeks amendments to Policy 6.7 to address reverse sensitivity issues. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Fonterra Co-operative Group Limited	pCARP-713	Policy 6.7	Support	The submitter seeks Policy 6.7 to be deleted and replaced with a new policy that addresses reverse sensitivity issues. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Selwyn District Council	pCARP-1118 pCARP-1119	Policy 6.7	Support	The submitter seeks Policy 6.7 to be deleted and replaced with a new policy that addresses reverse sensitivity issues and is consistent with Policy 14.3.5(1) of the Canterbury RPS. Ravensdown supports this submission as it agrees with the matters raised, is consistent with its own submission, and represents sound resource management practice.
Waimakariri District Council	pCARP-1335 pCARP-1337	Policy 6.7	Support	The submitter seeks Policy 6.7 to be deleted and replaced with a new policy that addresses reverse sensitivity issues and is consistent with Policy 14.3.5(1) of the Canterbury RPS. Ravensdown supports this submission as it agrees with the matters raised, is consistent with its own submission, and represents sound resource management practice.
Ballance Agri-Nutrients Limited	pCARP-2205	Policy 6.7	Support	The submitter seeks Policy 6.7 to be deleted and replaced with a new policy that addresses reverse sensitivity issues. Ravensdown supports this submission as it agrees with the matters raised, is consistent with its own submission, and represents sound resource management practice.

Canterbury District Health Board	pCARP-558	Industrial and large scale discharges to air	Support	The submitter seeks a new policy to inform the consideration and granting of discretionary activity consents [in particular in relation to rules 7.17 and 7.18]. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Winstone Wallboards Limited, a division of Fletcher Building	pCARP-2165	Policy 6.21	Support in part/oppose in part	The submitter seeks the deletion of the reference to Ambient Air Quality Guidelines 2002 Update in Policy 6.2 and replace with NESAQ Standards, or refer to the NESAQ as well as any values in the Ambient Air Quality Guidelines 2002 update that are not covered by NESAQ. Ravensdown supports the deletion of the reference to the AAQG 2002 and this is consistent with its own submission and represents sound resource management practice. However, Ravensdown opposes the amendment to Policy 6.2 as it is inappropriate and unnecessary, inconsistent with its own submission, and does not represent sound resource management practice.
Fletcher Building Limited	pCARP-2326	Policy 6.21	Support in part/oppose in part	The submitter seeks the deletion of the reference to Ambient Air Quality Guidelines 2002 Update in Policy 6.2 and replace with NESAQ Standards, or refer to the NESAQ as well as any values in the Ambient Air Quality Guidelines 2002 update that are not covered by NESAQ. Ravensdown supports the deletion of the reference to the AAQG 2002 and this is consistent with its own submission and represents good resource management practice. However, Ravensdown opposes the amendment to Policy 6.2 as it is inappropriate and unnecessary, inconsistent with its own submission, and does not represent sound resource management practice.
Bathurst Resources Limited	pCARP-2227	Rules7	Support in part	The submitter seeks the deletion of rules that limit the discharge of PM _{2.5} and seeks a policy that requires monitoring and assessment prior to rules being adopted. Ravensdown supports the deletion of rules that limit the discharge of PM _{2.5} as it is consistent with its own submission and represents sound resource management practice.
Straterra Inc.	pCARP-2753	Rules7	Support in part	The submitter seeks the deletion of rules that limit the discharge of PM _{2.5} and seeks a policy that requires monitoring and assessment prior to rules being adopted. Ravensdown supports the deletion of rules that limit the discharge of PM _{2.5} as it is consistent with its own submission and represents sound resource management practice.
Ravensdown Fertiliser Co-operative Ltd	pCARP-2772	Rule 7.1	Oppose	The Summary of Submissions document does not accurately reflect the submission point being made by Ravensdown. Ravensdown seeks for Council to delete the second part of Rule 7.1: " <i>Where two rules are</i>

				<i>applicable to the same activity, the more stringent activity status applies.”</i>
Horticulture New Zealand	pCARP-1084	Rule 7.3	Support	The submitter seeks Rule 7.3 to be amended to be discretionary activity. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Bathurst Resources Limited	pCARP-2234	Industrial, trade and large scale discharges to air	Support	The submitter seeks to amend or delete all relevant rules relating to discharges into air from large scale, industrial and trade premises to make adequate and appropriate provision for existing industrial and commercial activities to continue their existing activities and to be able to expand on existing sites and for new industrial and commercial activities to locate and commence on appropriate sites. Ravensdown supports this submission as it agrees with the matters raised and represents sound resource management practice.
balance Agri-Nutrients Limited	pCARP-2286	Industrial, trade and large scale discharges to air	Support	The submitter seeks an additional Rule 7.29A that provides for the handling, storage and manufacture of fertiliser products as restricted discretionary activity, with Council’s discretion restricted to the matters included in the rule. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
GL Bowron and Co Ltd	pCARP-1267	Rule 7.14	Support	The submitter seeks clarification of the interaction between Rule 7.14 and Rule 7.18 to avoid confusion or unintended consequences and to provide for offsets where appropriate. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Straterra Inc.	pCARP-1955	Rule 7.14	Support	The submitter seeks clarification of the interaction between Rule 7.14 and Rule 7.18 to avoid confusion or unintended consequences and to provide for offsets where appropriate. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Ravensdown Co-operative Ltd	pCARP-2777	Rule 7.17	Oppose	The Summary of Submissions document does not record the fact that Ravensdown sought for matters the Council would restrict its discretion would need to be determined, and would be similar matters to those included in Rule 7.14.
Canterbury Aggregate Producers Group	pCARP-3015	Rule 7.38	Oppose	The submitter seeks Rule 7.38 be deleted and replaced with a rule that only applies to mineral extraction activities. Ravensdown opposes the deletion of Rule 7.38 which provides for the discharge of contaminants into air from

				the outdoor storage of bulk solid materials. Ravensdown supports Rule 7.38 as it represents sound resource management practice.
Bledisloe New Zealand Ltd	pCARP-1005	Rule 7.52	Support in part	The submitter seeks for an amendment to Condition 1 of Rule 7.52 to specify a limit below which contaminants listed in Schedule 4 are permitted. Ravensdown supports this request as it is appropriate and logical and represents sound resource management practice.
Ballance Agri-Nutrients Limited	pCARP-2282	Rule 7.72	Support	The submitter seeks Rule 7.72 to be retained. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.
Ballance Agri-Nutrients Limited	pCARP-2284	Rule 7.74	Support	The submitter seeks 'fertiliser' to be added to the rule. Ravensdown supports this submission as it is consistent with its own submission and represents sound resource management practice.