

In the matter of the Resource Management Act 1991

And

In the matter of the Proposed Canterbury Air Regional Plan

SUMMARY OF EVIDENCE PRUE HARWOOD

11 November 2015

Summary of Evidence

- 1 Synlait's milk processing factory is appropriately located within a sparsely populated rural area well away from sensitive receptors.
- 2 Synlait uses the best practicable option to control the discharges from the energy plant and dryers.
- 3 The discharges to air from Synlait have only localised effects on ambient air quality. In the vicinity of the closest houses the effects of Synlait's air discharges on ambient air quality are negligible.
- 4 The Proposed Canterbury Regional Plan (pCARP) as currently proposed may result in any further growth of the Synlait plant being significantly constrained due to the inclusion of the non-complying and prohibited activity status in Rules 7:17 and 7:18 despite Synlait having minimal and very localised effects on air quality.
- 5 Rules 7:17 and 7:18 as originally proposed in the pCARP rely solely on the Ambient Air Quality Guidelines (AAQG) to determine the activity status of industries such as Synlait and whether or not a consent can be granted. This is an inappropriate use of the AAQG and does not allow for consideration of the many other matters that should be taken into account when assessing the effects of a discharge. Furthermore in rural areas there is very limited air quality data available on which an assessment of compliance with the AAQG could be made. Gathering such information would be very expensive and time consuming. I support the recommendation in the Section 42A report to delete these rules.
- 6 The policies and rules of the pCARP need to make a clear distinction between the management requirements for ambient air quality and individual discharges as is the case in the Regional Policy Statement (RPS). I recommend Policies 6.2 and 6.3, which refer to the AAQG, are revised as recommended by Synlait to make it clear that they relate only to the management of ambient air quality.
- 7 I support different management approaches being used for areas where air quality is degraded and where it is generally high and consider that these differences should be clearly stated in the Plan. I also support the promotion of the best practicable option in the pCARP policies.
- 8 Policies 6.20 and 6.21, as revised by Synlait, clearly identify that in rural areas where air quality is generally good the priority for air quality management is minimising localised effects and in clean air zones, where air quality is degraded, the priority is the management of cumulative effects. Policy 6.21, as revised by Synlait, also clearly identifies that the AAQG should be applied where people are likely to be exposed to a discharge.