

My submission is from two aspects

- 1) Firstly from the point of view that it is unfair to change the rules and make them apply from the date they are notified. A fairer way would be to notify them but allow a period of time before they apply to any new application. It is like shifting the goal posts without any warning. Doing it this way will knock business confidence and hinder investment.
To be specific about our situation, I was unaware that a new air plan was being proposed and that large scale burning device rules were up for review. I had looked into the rules prior to purchasing land and equipment & found that my proposed discharge would be a controlled activity under rule AQL26. Now it appears it is discretionary with a lot more required in the application, adding considerable cost and uncertainty to our proposed nursery operation.
- 2) Secondly, in relation to large scale solid fuel burning devices, the new plan seems incomplete, difficult to follow and will make more difficult to obtain consent. In particular, there is no mention regarding large scale solid fuel burning devices outside the clean air zones, burning woodchip or coal with particulate emissions of less than 250mg/cu m as in rule 7.16. They are not included as permitted activities under rules 7.19 to 7.21, and that are not "discretionary" under rules 7.16 ie less than 250mg/m3.
- 3) I submit that there needs to be an additional rule for solid fuel burners that similar to AQL26 that makes this a controlled activity with controls including the new proposed limits on the sulphur content of the fuel and the particulate emission