



Hanmer Springs

Thermal Pools & Spa

Proposed Canterbury Regional Air Plan Hearings Panel.

c/-Tera Maka

Hearings Officer Planning

Environment Canterbury

By email – Tera.Maka@ecan.govt.nz

Dear Ms Maka

SUBMISSION ON PROPOSED REGIONAL AIR PLAN BY HANMER SPRINGS THERMAL POOLS AND SPA

It would be appreciated if this letter could please be provided to the Hearings Panel in lieu of necessitating an appearance at the Proposed Regional Air Plan Hearing on 27 November 2015.

Hanmer Springs Thermal Pools and Spa lodged a submission to the Proposed Canterbury Regional Air Plan (attached). The submission sought that a new permitted activity rule be inserted into the Plan to provide for the discharge of hydrocarbon, including flaring associated with the extraction and use of thermal water as a permitted activity. Permitted activity conditions were suggested that ensure and any actual or potential adverse effects were appropriately managed.

The addition of a new rule was sought as there is a lack of clarity as to whether the discharge of the type undertaken by the Hanmer Springs Thermal Pools and Spa is captured as being a discharge of contaminant from an industrial or trade premises into air. The proposed plan as drafted means it is unclear whether the rules 7.14-7.59 apply to this discharge or not given the words “within and outside of industrial and trade premises, unless a rule specifies otherwise”. This could be read to apply to the whole region irrespective of any relationship with an industrial or trade premises. In addition there was concern as to whether the Hanmer Springs Thermal Pools and Spa constituted industrial or trade premises, as if so it is noted that the discharge of hydrocarbon and flaring occurs on the adjacent site which is a public reserve.

It is important to provide for this activity as a distinct activity within the Regional Air Plan so that it is not inadvertently caught by other rules such within the plan such as those for example relating to:

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Hanmer Springs

Thermal Pools & Spa

- outdoor burning (clearly distinguishing that the flaring is not burning)
- rules applying to hydrocarbon manufacture (distinguishing that the activity undertaken is not and had very different characteristics to hydrocarbon manufacture, refining or purification)
- other rules relating to discharge of gases from industrial and trade premises.

It is noted that the submission of the Hanmer Springs Thermal Pools and Spa has not been specifically considered and addressed in the Section 42A report. This has been discussed briefly between the Hanmer Springs Thermal Pools and Spa planning consultant (Jane Whyte) with the report author (Lisa Jenkins) and it is understood that this is an oversight and that this could be addressed by the Section 42A report authors in their reply.

Given this the Hanmer Springs Thermal Pools and Spa are comfortable for the submission to be considered by the Panel without the need to appear.

The outcome sought is as specified in the submission which is the insertion of a new rule.

Yours sincerely

Graeme Abbot

General Manager

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**SUBMISSION ON THE PROPOSED CANTERBURY REGIONAL AIR PLAN
PREPARED UNDER THE FIRST SCHEDULE TO THE RESOURCE
MANAGEMENT ACT 1991**

To: Canterbury Regional Council
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CHRISTCHURCH 8140

mailroom@ecan.govt.nz

Name: Hanmer Springs Thermal Pools and Spa
PO Box 30
HANMER SPRINGS 7360

Attention: Graeme Abbot
Phone: (03) 03 3150001
Email: graeme@hanmersprings.co.nz

Hanmer Springs Thermal Pools and Spa makes submissions on the Proposed Canterbury Regional Air Plan (PRAP) set out in the **attached** document.

Hanmer Springs Thermal Pools and Spa confirms its submission does not relate to trade competition or the effects of trade competition.

Hanmer Springs Thermal Pools and Spa would like to be heard in support of its submission

If other persons make a similar submission then Hanmer Springs Thermal Pools and Spa would consider presenting joint evidence at the time of the hearing.



Graeme Abbot
For and behalf of Hanmer Springs Thermal Pools and Spa

Dated this 1st day of May 2015

SUBMISSION

1 New Rule

1. Hanmer Springs Thermal Pools and Spa utilises natural thermal waters from a bore adjacent to the pool facilities. Thermal water has been used in this location since the 1850's. The Hanmer Springs Thermal Pools and Spa facility is a major contributor to the Hurunui economy and is one of the areas large employers.
2. A consequence of extracting the thermal water is the discharge of hydrocarbon gas (methane) to air. To ensure health and safety outcomes, rather than allow this gas to dissipate into the environment, it is contained and then discharged and flared on a site adjacent to the Hanmer Springs Thermal Pools and Spa facility. The discharge to air is minor in nature and is part of the existing environment.
3. It is not clear from reading the Plan that this activity has been provided for. To ensure this important and necessary activity can continue a new rule is sought to be included. Given the minor nature of any adverse effects of this discharge it is appropriate to be provided for as a permitted activity.
4. The following **relief is sought:**
 - a) Insert a new Rule to read
New Rule:
The discharge of hydrocarbon, including combustion involving flaring, in association with the extraction and use of thermal water, is a permitted activity providing the following conditions are met:
 1. The discharge does not cause a noxious or dangerous effect; and
 2. No material is to be flared or incinerated other than that derived from a bore stream.
 - b) In addition to the above, the following relief is also sought:
 - i. Any additional or alternative relief that achieves the same or similar outcome;
 - ii. Consequential or ancillary changes to the above.