

SUBMISSION
MINUTE AND DIRECTION OF HEARING COMMISSIONERS
PROPOSED CANTERBURY AIR REGIONAL PLAN
[Minute 3]

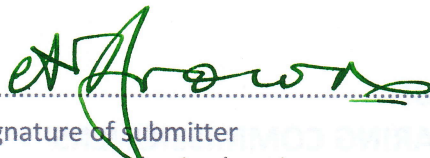
To: **Environment Canterbury**

Name of submitter: **Bathurst Resources Limited**

This is a submission on the Memorandum of Counsel for the Canterbury Regional Council dated 18 December 2015 (**Memorandum**) which sets out in the attached Appendix A the proposed rewording of policies and rules relating to Industrial and Large Scale Discharges to Air in the Proposed Canterbury Air Regional Plan 2015 (**Proposed Plan**).

Background

1. Bathurst Resource Ltd (**Bathurst**) was a submitter on the Proposed Plan and in particular on those sections, policies and rules, relating to industrial discharges to air.
2. Accordingly as per Minute 3 Bathurst wishes to make a further submission on the proposed wording changes set out in the Memorandum.
3. The proposed changes to the wording of Policies 6.19-6.24, and the addition of Policies 6.22A and 6.22B, as well as the proposed deletion of Rules 7.18 and 7.19 are generally supported subject to our comments below.
4. In proposed Policy 6.22(4) the words “economically and practically” should be inserted before the word “available”. This is to ensure that the appropriate test is applied particularly around fuel choice. For example while bottled gas is available it would be highly unlikely that this it be economically viable for large scale industries in the South Island nor in fact physically practical given likely levels of consumption.
5. Bathurst is also concerned that the distinction between localised and ambient air quality on which it, and many others, submitted is incorporated into the Proposed Plan which may necessitate further wording changes to those set out in the Memorandum. At present the language used refers to “cumulative and local adverse effects on air quality” which would not be consistent with a distinction between effects on ambient and local air quality.


Signature of submitter
(or person authorised to sign
on behalf of submitter)

26/1/16
Date

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