

10 February 2016

Project No. 1529544\_006

Independent Commissioners - Proposed Canterbury Air Regional Plan Hearing  
 Canterbury Regional Council  
 PO Box 345  
 Christchurch 8140  
 (By email - [tera.maka@ecan.govt.nz](mailto:tera.maka@ecan.govt.nz))

**PROPOSED CANTERBURY AIR REGIONAL PLAN – RESPONSE TO PROPOSED AMENDMENTS TO POLICIES 6.19 TO 6.22B AND RULES 7.17 AND 7.18 (MEMORANDUM DATED 18 DECEMBER 2015)**

Dear Sir and Madams

This letter is filed on behalf of St George's Hospital Incorporated (St George's) (Submitter 63131) in response to the memorandum dated 18 December 2015 outlining the Canterbury Regional Council's (Council) Officers' proposed amendments to specific Industrial and Large Scale Discharges to Air provisions of the Proposed Canterbury Air Regional Plan (pCARP). These proposed amendments respond to Minute 3 from the Hearing Commissioners requesting Council to redraft Policies 6.20 and 6.21 and Rules 7.17 and 7.18 of the pCARP.

St George's comments on the proposed amendments are provided in the following table.

<b>Amended provisions</b>	<b>St George's comments</b>
Deletion of Rule 7.18 (and also Rule 7.17)	This is consistent with evidence presented for St George's at the hearing and is therefore supported.
General – proposed policy amendments	We note that the Council Officers have proposed amendments to Policies 6.19 to 6.22 (i.e., now including new Policies 22A and 22B) inclusive, even though Minute 3 only requested redrafting of Policies 6.20 and 6.21. While it seems that some of the proposed amendments may be considered outside of the scope of Minute 3, we have commented on relevant redrafted policies below. Policy 6.22A is not commented on as it only relates to discharges to air outside of gazetted airsheds and therefore is not applicable to St George's.
Policy 6.19	The issues raised in Carmen Taylor's planning evidence have not been addressed in the proposed amendments. On this basis, we continue to seek changes in accordance with those proposed in Carmen Taylor's evidence.
Policy 6.20	St George's submission requested the deletion of this policy as it was unnecessary given that Policy 6.10 already provided for the application of the best practicable option. In evidence, St George's advised that as the policy, as originally drafted, did not unduly constrain its operations it was not a key submission point for St George's. However, the proposed addition of part (2) of this policy does have the potential to constrain St George's operations in the future. This addition, incorrectly changes the widely accepted approach to reverse sensitivity issues. As this matter was traversed in Carmen Taylor's planning evidence (paragraphs 4.24 and 4.43) in relation to Policies 6.7, 6.8 and 6.19 of the pCARP, we do not propose to repeat the detail in this letter. However, given the amendments proposed by Council Officer's to Policy 6.20, we consider that Policy 6.20 should preferably be deleted in full, or at a minimum part (2) of this policy should be deleted.




Amended provisions	St George's comments
Policy 6.21	Carmen Taylor, in her planning evidence on behalf of St George's, expressed the opinion that Policies 6.21 and 6.22 were unnecessary and should be deleted. The amended Policy 21 in effect amalgamates these earlier policies, and therefore we are of the opinion that they are still unnecessary and should be deleted (for the same reasons as outlined in evidence).
Policies 6.22 and 6.22B	<p>These policies are considered unnecessary and therefore could be deleted.</p> <p>In relation to Policy 6.22 the policy is unclear as to what it is trying to achieve. Its aim seems to be to avoid significant increases in PM<sub>10</sub> but it also seems to contain a number of guidance considerations (in parts (1) to (5) of the policy). Avoiding significant increases in PM<sub>10</sub> does not need to be provided for by this policy as this is a matter provided for by the National Environmental Standard for Air Quality (i.e., in terms of what PM<sub>10</sub> discharges are significant and the resource management response required if they are).</p> <p>Parts (1) to (4) of Policy 6.22 outline aspects of the assessment approach generally used by experts to assess the effects of such discharges. If such guidance items were to be retained, they may sit better in the information requirements section.</p> <p>In relation to part (1) of Policy 6.22, this inappropriately focuses on certain discharges that are only responsible for a relatively small portion of PM<sub>10</sub> discharges (i.e., domestic and vehicle emissions discharges tend to dominate PM<sub>10</sub> concentrations in an airshed). On this basis, Part (1) of Policy 6.22 is not appropriate, particularly as it focusses on the source of emission rather than the effects of the discharge.</p>

If required by the Hearing Commissioners, Carmen Taylor can make herself available, over the phone, on Monday 4 April 2016 to speak to the matters outlined above. Alternatively, Carmen's colleague Kevin Bligh is likely to be available to speak to the above matters in person if required.

Yours sincerely

**GOLDER ASSOCIATES (NZ) LIMITED**



Carmen Taylor  
Senior Planner

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