



Ashburton

DISTRICT COUNCIL

Submission to Proposed Canterbury Air Regional Plan

Attention: Environment Canterbury
PO Box 345
Christchurch 8140

Ashburton District Council (ADC) wishes to speak to its submission and would consider joining with other parties to make joint submissions on points of common interest.

Please note that this submission should be read in conjunction with ADC's earlier submission on this Plan.

Submission points follow:

Submission: New Rule

Reason for submission:

ADC is aware that there is new technology emerging in the field of renewable energy generation, particularly in high temperature incineration plants which utilise the burning of wood and plant materials (biomass) in order to generate electricity and that under the Air Plan, as proposed, this type of activity would be prohibited under proposed rule 7.32.

ADC notes that Canterbury Regional Policy Statement defines renewable electricity generation and that this definition includes Biomass as a source of energy. ADC further notes that Renewable electricity generation activities are defined as:

The construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community scale distributed generation activities, the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid, and electricity storage technologies associated with renewable electricity.

The waste Minimisation Act 2008 (WMA) defines waste as material disposed of or discarded (with no end use). Material that can be utilised in other processes or uses are defined as being "Diverted", "Recovered" or "Re-used".

ADC considers that where biomass can be used as a source of energy for renewable electricity generation, it does not fall within the definition of waste, but rather as "recovery" under the WMA.

Ashburton District (through a number of its activities) generates a significant amount of biomass which is predominantly disposed of in landfill or is trucked to other locations. It appears that in certain instances, the conversion of this material into energy would be more efficient and sustainable than current practices.

Further, ADC believes that granting relief for specifically designed waste to energy facilities would assist with the intent and purpose of waste minimisation in the WMA and would allow ADC to further meet its obligations under the WMA without undue limitation.

ADC considers that the use of biomass for renewable energy generation should be considered as being separate to other activities where biomass is considered to be “waste” and that this differentiates these activities from those anticipated within proposed rule 7.32.

Decision requested:

That relief be provided within the Air Plan to clearly differentiate biomass and, where appropriate, other recovered and diverted fuels to be used for the generation of renewable energy, from that being disposed of as waste; and

To introduce or amend rules, policies and objectives so as to allow the consideration of resource consent applications for biomass and, where appropriate, other recovered and diverted fuels where they are to be used in the generation of renewable energy so that such proposals can be considered on their individual merits.