

12 DEC 2011

Business Information  
Services

23  
PC - X-  
(Office Use Only)



DUNEDIN CITY  
COUNCIL  
Kaurihera-rohe o Teapori

**SUBMISSION FORM 5**  
**Clause 6 of First Schedule, Resource Management Act 1991**

**Submission on publicly notified proposed  
District Plan Change 13 - Hazardous Substances.**

**Submissions can be:**

**Posted to:** Planning Policy Manager, Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

**Delivered to:** Planning Enquiries, Customer Service Centre, Civic Centre, 50 The Octagon, Dunedin

**Faxed to:** 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)

**Emailed to:** planning@dcc.govt.nz

**Note to Submitter:** The closing date for serving submissions on the Dunedin City Council is **12 December 2011.**

**Your name and contact details:**

Your Full Name: Mr Simon Van Westoby

Full Address: 7 Maryhill Tce, Mornington, Dunedin 9011

Telephone: 03-4530477 Facsimile: \_\_\_\_\_

Email Address: westoby@es.co.nz

I: ~~Do~~ **Do** wish to be heard in support of this submission at the hearing

~~If others make a similar submission, I will consider presenting a joint case with them at a hearing.~~  
(Delete the above statement if you would not consider presenting a joint case at a hearing)

**The specific provisions of Proposed District Plan Change 13 that my submission relates to are:**

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

Volumes of ammunition proposed by Plan Change 13  
I oppose the 15kg Max, and it be amended to 25kg  
Max

Reason for my views

I am a competitive shooter in several disciplines,  
plus an avid reloader and ammunition collector.

Presently I am comfortably over that limit,  
one of the competitions involves long range shooting  
A.T.C.

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

beyond 1000m which I use an 0.5 BMG Calibre (225 gns per Cartridge). I keep between 20-40 rds loaded at all times.

(Please give precise details.)

(Please give precise details.)

I seek the council to amend the 15kg limit and too increase it to 25kg Max. To be in line with the rest of the country

**Signature of submitter:**

*S. Chintala*  
(or person authorised to sign on behalf of sub)

**Date:**

8-12-11

**Electronic Submissions:** A signature is not required if you make your submission by electronic means. Submissions can be sent by email to [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)

This is in lieu of **SUBMISSION FORM 5**, cited under Clause 6 of the First Schedule of the Resource Management Act 1991, as being the prescribed form for making submission on publicly notified proposed **District Plan Change 13 – Hazardous Substances**

Otago Branch (Inc)

New Zealand Deerstalkers' Association

P O Box 701

DUNEDIN

Telephone (landline): 03 473 8317

Fax: 03 473 1117

Email:

We do wish to be heard in support of this submission.

We would consider presenting a joint case with like-minded others at a hearing.

**Specific provisions of Proposed District Plan Change 13 to which my submission relates are:**

Table 17.1 Explosives, p 17:38

**My submission is that:**

#### **Introduction**

The Otago Branch of NZDA has over 200 members, variously hunters, competitive target shooters, game bird hunters and ammunition reloaders. The branch was formed in the late 1940s and has occupied its club rooms in Woodhaugh since 1971.

Our comments are restricted to class 1 hazardous substances, those of class 1.1D, 1.3C and 1.4S.

Many of our members are part of the farming community, and many hunt within the Dunedin City Council land area which is some 3,300 square kilometres in extent.

#### **Support:**

The provisions shown in **Table 17.1 as it deals with goods of class 1.3C, namely smokeless ammunition reloading powder in Group 1 zones are supported**. This is because this agrees with the provisions of regulation 23 of the Hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177), ( p. 125) of the consolidated volume headed "SR 2001/116".

#### **Objections:**

We have two objections:

1. That portion of Table 17.1 page 17:38 as it deals with goods of class 1.1D ("Gunpowder and blackpowder" is objected to. This is because under the Hazardous Substances and New Organisms Act (1996) and subsequent Regulations, the allowable quantity is 15 kg.

Accordingly, our objection to the quantity of 5 kg, as proposed by Plan Change 13, is because it is only a third of what is allowed under Regulation 23 of the Hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177)(p. 125)(pse refer to "SR 2001/116".

- 2 We also object to that portion of Table 17.1 page 17:38 as it deals with goods of class 1.4S, "safety ammunition".

Our objection to this part of the proposed Plan Change 13 arises because the allowable quantity is only 40% of what is allowed under Regulation 23 of the Hazardous Substances (Class 1 to 5 Controls) Amendment Regulations 2003 (SR 2003/177)(p. 125)(SR 2001/116).

It is appreciated that the quantity allowed an increase on what is currently permitted (when taken in conjunction with that for class 1.3C explosives).

Several references indicate that safety cartridges, commonly known as small arms ammunition, items of hazard class 1.4S, have long been recognised as a product which will NOT mass explode, is NOT super-sensitive, and when exposed to fire, does not produce fragments beyond a maximum of 15 m (50 feet), these being of such small size as to be unable to puncture cardboard cartons which

### **We seek the following decision from the Council**

- For goods of class 1.3C, namely smokeless ammunition reloading powder in Group 1 zones, we wish the Council to retain the measures as proposed.
- For goods of class 1.1D ("Gunpowder and blackpowder"), we would like the Council to change the quantity lawfully able to be held by residents in Group 1 zones from 5 kg to to 15 kg in accord with the HSNO Regulations (2003).
- For goods of class 1.4S ("safety ammunition"), I would like the Council to change the quantity lawfully able to be held by residents in Group 1 zones from 15 kg to to 25 kg in accord with the HSNO Regulations (2003).

Paul Horsman

Secretary

Otago Branch (Incorporated)

New Zealand Deerstalkers' Association

**Teresa Gutteridge**

**From:** Nic Jepson  
**Sent:** Thursday, 8 December 2011 12:20  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission

---

**From:** Evan Johnston [mailto:break1@xtra.co.nz]  
**Sent:** Thursday, 8 December 2011 08:59 a.m.  
**To:** planning@dcc.govt.nz  
**Subject:** Plan Change 13 - Hazardous Substances Online Submission

FROM Evan Johnston

Evan Johnston has made a submission to the "Plan Change 13 - Hazardous Substances via the online application form. Below are the details of the feedback.

**Your details**

- First name: Evan
- Last name: Johnston
- Organisation: member Dunedin Claytarget Club
- Street address: 14 Shand St
- Suburb: Green Island
- Town / city: Dunedin
- Post code: 1980
- Email address: break1@xtra.co.nz
- Day phone: 0274342123
- Evening phone: same

**Your submission**

- I Do/Do Not wish to be heard in support of this submission at the hearing: Do Not
- If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes
- The specific provisions of Proposed District Plan Change 13 that my submission relates to are:: The per kg amount allowable for home storage of class 1.4s safety ammunition .
- My submission is that:: Other big cities have set their amounts to HSNO Regulations that covers nation wide, of 25kg for home storage of 1.4s safety ammunition, not 15kg
- I seek the following decision from the Council:: To set home storage for 1.4s safety ammunition to 25kg and not 15kg.
- Attachment: No file uploaded
- Attachment: No file uploaded





**SUBMISSION FORM 5**  
**Clause 6 of First Schedule, Resource Management Act 1991**

**Submission on publicly notified proposed  
District Plan Change 13 - Hazardous Substances.**

**Submissions can be:**

- Posted to:** Planning Policy Manager, Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058
- Delivered to:** Planning Enquiries, Customer Service Centre, Civic Centre, 50 The Octagon, Dunedin
- Faxed to:** 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)
- Emailed to:** planning@dcc.govt.nz

**Note to Submitter:** The closing date for serving submissions on the Dunedin City Council is **12 December 2011.**

**Your name and contact details:**

Your Full Name: Steve Kieby

Full Address: S HEERMAN RD RD1 OUTRAM  
OTAGO

Telephone: 0275565506 Facsimile: \_\_\_\_\_

Email Address: SKIEBY@VODAFONE.CO.NZ

I: ☒ **Do Not** wish to be heard in support of this submission at the hearing

If others make a similar submission, I will consider presenting a joint case with them at a hearing.  
(Delete the above statement if you would not consider presenting a joint case at a hearing)

**The specific provisions of Proposed District Plan Change 13 that my submission relates to are:**  
(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

I SUPPORT PLAN CHANGE 13 BUT SUBMIT  
THAT THE ALLOWABLE LIMITS BE SET AT  
THE SAME LEVELS THAT ARE CURRENTLY  
IN PLACE, THIS WILL KEEP DUNEDIN  
IN LINE WITH THE REST OF THE  
LOCAL COUNCILS THROUGHOUT THE COUNTRY.

**My submission is that:**

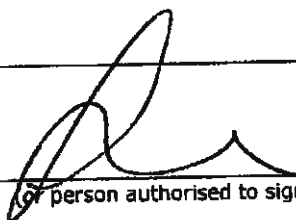
(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

As on PREVIOUS PAGE.

**I seek the following decision from the Council:**  
(Please give precise details.)

THAT THE COUNCIL DECIDES TO  
LEAVE ALLOWABLE LIMITS AS THEY  
ARE & IN LINE WITH HAZNO &  
OTHER COUNCILS.

Signature of submitter: \_\_\_\_\_




(of person authorised to sign on behalf of submitter)

Date: 11-12-11

Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the plan change process.

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)



 <b>DUNEDIN CITY COUNCIL</b> <small>Kaunihera-a-rohe o Otago</small>	<b>SUBMISSION FORM 5</b> <b>Clause 6 of First Schedule, Resource Management Act 1991</b>
	<b>Submission on publicly notified proposed District Plan Change 13 - Hazardous Substances.</b>

**DCC**
**12 DEC 2011**
Business Information
**Submissions can be:**

**Posted to:** Planning Policy Manager, Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

**Delivered to:** Planning Enquiries, Customer Service Centre, Civic Centre, 50 The Octagon, Dunedin

**Faxed to:** 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)

**Emailed to:** planning@dcc.govt.nz

**Note to Submitter:** The closing date for serving submissions on the Dunedin City Council is **12 December 2011**.

**Your name and contact details:**

Your Full Name: Ellen Kilby

Full Address: 5 Heenan Road, RDI, Outram, 9013 Otago

Telephone: 027 634 8889 Facsimile: N/A

Email Address: ellenkilby@vodafone.co.nz

I: ☒ **Do** ☐ **Do Not** wish to be heard in support of this submission at the hearing

If others make a similar submission, I will consider presenting a joint case with them at a hearing.  
 (Delete the above statement if you would not consider presenting a joint case at a hearing)

**The specific provisions of Proposed District Plan Change 13 that my submission relates to are:**

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

I support plan change 13, but submit that the allowable limit be set at the same levels that are currently in place. This will keep Dunedin in line with the rest of the councils throughout NZ why be the only different region in NZ?

**My submission is that:**

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

As on previous page.

**I seek the following decision from the Council:**

(Please give precise details.)

~~We seek~~ The council decides to leave the allowable limits as they are to stay in line with HAZNO and other councils.

Signature of submitter: \_\_\_\_\_

(or person authorised to sign on behalf of submitter)

Date: \_\_\_\_\_

11/12/11

Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the plan change process.

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)



**DUNEDIN CITY**  
**COUNCIL**  
Kaumihara-a-rahe a Otepoti

**SUBMISSION FORM 5**  
**Clause 6 of First Schedule, Resource Management Act 1991**

**Submission on publicly notified proposed  
District Plan Change 13 - Hazardous Substances.**

**Submissions can be:**

**Posted to:** Planning Policy Manager, Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058

**Delivered to:** Planning Enquiries, Customer Service Centre, Civic Centre, 50 The Octagon, Dunedin

**Faxed to:** 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)

**Emailed to:** planning@dcc.govt.nz

**Note to Submitter:** The closing date for serving submissions on the Dunedin City Council is **12 December 2011.**

**Your name and contact details:**

Your Full Name: Alec Cassie

Full Address: Wenita Forest Products, Box 341, Mosgiel

Telephone: 03 489 9305 Facsimile: 03 489 3303

Email Address: alec.cassie@dn.wenita.co.nz

I: ~~Do~~ **Do Not** wish to be heard in support of this submission at the hearing

~~If others make a similar submission, I will consider presenting a joint case with them at a hearing.~~  
(Delete the above statement if you would not consider presenting a joint case at a hearing)

**The specific provisions of Proposed District Plan Change 13 that my submission relates to are:**

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

Rule 17.5.1 Permitted Activities & the associated

Table 17.1

In particular how the stated thresholds for  
diesel & petrol relate to the quantities  
used & stored on site in typical forest  
harvesting operations.

**My submission is that:**

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on a separate sheet if necessary.)

I am writing in support of the listed thresholds in Table 17.1 for Petrol 3.1A & Diesel 3.1D, for situations where these products are stored in containers  $\leq 450$  l, and also where stored in containers  $> 450$  l, as they relate to Forestry (Crops). The DCC state that the proposed thresholds are aligned with and are no more restrictive than the national regulations, and my experience is that the proposed thresholds will not impose an unreasonable restriction on forest harvesting operations. On that basis I support the plan change.

**I seek the following decision from the Council:**

(Please give precise details.)

To approve the Proposed District Plan Change 13, as it relates to the areas noted above.

Signature of submitter: \_\_\_\_\_

(or person authorised to sign on behalf of submitter)

Date: \_\_\_\_\_

29/11/11

Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the plan change process.

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be sent by email to [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)

**Teresa Gutteridge**

---

**From:** Nic Jepson  
**Sent:** Monday, 5 December 2011 17:00  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Hazardous Substances Plan Change- University of Otago Submission  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed  
**Attachments:** 20111205094400605.pdf

---

**From:** Katrina Roos [mailto:katrina.roos@otago.ac.nz]  
**Sent:** Monday, 5 December 2011 09:47 a.m.  
**To:** planning@dcc.govt.nz  
**Subject:** Hazardous Substances Plan Change- University of Otago Submission

Hello there,

Please find attached the submission by the University of Otago regarding Plan Change 13- Hazardous Substances. We **do not** wish to be heard on this submission.

Please let me know if there are any problems with the document and whether you require a hard copy via post.

Kind regards,

Katrina Roos

Resource Planner/Policy Advisor  
Strategy & Planning  
Property Services  
University of Otago  
P: + 64 3 4798024  
F: + 64 3 4798030  
E: katrina.roos@otago.ac.nz

5/12/2011



**Form 5 Submission on publicly notified proposal for policy statement or plan-  
Plan Change 13- Hazardous Substances**

*Clause 6 of First Schedule, Resource Management Act 1991*

**To: Dunedin City Council**

Planning Policy Manager  
City Planning  
Dunedin City Council  
PO Box 5045  
Dunedin 9058

Contact Phone: 03 477 4000

Contact Email: [planning@dcc.govt.nz](mailto:planning@dcc.govt.nz)

**Name of submitter:**

University of Otago  
Property Services Division  
111 Albany Street  
PO Box 56  
Dunedin 9054

Contact Phone: 03 479 8024

Contact Email: [katrina.roos@otago.ac.nz](mailto:katrina.roos@otago.ac.nz)

This is a submission on the publicly notified proposal by the Dunedin City Council to amend the Hazardous Substances rules in Section 17 of the Dunedin City District Plan.

The specific provisions of the Plan Change that our submission relates to are:

The University of Otago welcomes the opportunity to comment on the Hazardous Substances Plan Change. The campus contains a large variety of hazardous substances for use in teaching and research as well as operations management. It is appropriate that the regulatory framework for control of hazardous substances under the Resource Management Act reflects the requirements of legislation and protects the health and safety of the public and the wider environment. However it is also important to ensure that District Plan regulations do not unfairly restrict the ability of the University and other organisations to manage hazardous substances without needing to apply for resource consent when the potential environmental effects are minimal.

The University is generally supportive of the proposed changes to the Hazardous Substances rules in Section 17, but has a number of comments to make regarding the permitted activity standards in Rule 17.5.1 and Table 17.1 and is seeking revised thresholds for certain hazardous substances. At this point the University opts to **oppose** the Plan Change until minor amendments are made as suggested in this submission.

Our submission is:

1. It is understood that the review of the Hazardous Substances rules in the Plan is considered necessary to bring the District Plan in line with the Hazardous Substances and New Organisms (HSNO) Act and its associated HSNO regulations. A comparison of the proposed Table 17.1 and the original table in the operative District Plan indicates that more sub-classifications of substances have been introduced in line with the relevant regulations and the use category of non-residential has been split into several categories to reflect the zones in the Plan, including the Campus Zone. This is considered to be a positive development that recognises the needs of different user groups in the city.
2. Council will be aware that the University provided extensive commentary on a previous draft of the Plan Change in August 2011 before it was released for public consultation. A number of issues that were raised in the University's previous submission have been addressed satisfactorily in the public draft and will not be repeated in this submission. Notably, the public draft clarifies in Rule 17.5.1 (vi) that the permitted quantity thresholds apply per hazardous sub-facility in the Campus Zone, which can be defined as a single dangerous goods cabinet or other approved store, which generously provides for the large volumes of hazardous substances stored in various locations on campus. The public draft also clearly explains in Note (i) of Rule 17.5.1 that domestic cleaning products are excluded from the regulations.
3. As the majority of the University's issues with the Plan Change have been resolved prior to the public draft, the focus of this submission will be upon the following outstanding issues in the permitted activity threshold Table 17.1 which form the basis of the University's opposition to the Plan Change in its current form:
  - The lack of a separate allowance for liquid nitrogen in large quantities in the Campus Zone.
  - The discrepancy between the threshold for Class 3.1C medium hazard flammable liquids at 250L, and the threshold for Class 3.1A high hazard liquids at 450L in the Campus Zone.
  - The lack of an allowance of Class 4.1.3A-C materials in small quantities for the Campus Zone.
  - The allowance of 20 kilograms or 20L of Class 6.1A-C materials for the Campus Zone.
  - The threshold of 5L for Class 8.3A substances (Eye Corrosives) for the Campus Zone.



4. The sub-class 2NH is listed in Table 17.1 of the draft Plan Change. There is no such classification currently recognised under the HSNO regulations, and therefore it is assumed that this refers to substances of Class 2.2 under the old Dangerous Goods system (non-flammable, non-toxic gases), but which are not currently recognised under the HSNO regulations. This would include a number of gases that the University uses, including carbon dioxide (CO<sub>2</sub>) and nitrogen (N<sub>2</sub>). For compressed gas cylinders (of CO<sub>2</sub> or N<sub>2</sub> gas) the 200m<sup>3</sup> threshold for 2NH would be unlikely to be exceeded in any sub-facility on campus. However, cryogenic liquids such as liquid nitrogen would also be covered under this class.
5. Liquid nitrogen is potentially an issue for the University as under Note (vii) in Rule 17.5.1 it states that where the volume of a hazardous substance is given this shall be considered to be the volume or weight present at 20 degrees Celsius and 101.3kPa. In the case of liquid nitrogen, this would mean the 200m<sup>3</sup> limit would apply to the volume that the liquid nitrogen would occupy as a gas – which is much greater than the liquid volume. There may be some sub-facilities where the volume of liquid nitrogen present would breach the 200m<sup>3</sup> limit if new tanks were required in the future. The Health Sciences Division in particular requires access to large quantities of this substance.
6. Standard AS1894-1997, which refers to the storage and handling of non-flammable cryogenic and refrigerated liquids, defines the capacity of cryogenic storage vessels in terms of their 'water capacity' and it is suggested that the Plan Change rules follow this approach. Non-flammable, non-toxic cryogenic liquids such as liquid nitrogen and helium present a very low risk to health and safety and the wider environment if properly stored and managed, so it is appropriate to allow the University a separate allowance given its need for bulk facilities. Standard AS1894 defines bulk storage vessels as being those with a water capacity of greater than 500L. **Therefore, it suggested that a 500L (water capacity) threshold for 'Non-flammable, non-toxic cryogenic liquids' (stored in accordance with AS1894-1997) is provided in the Table sub-class separate to the 2NH threshold for the Campus Zone.**
7. In accordance with the Plan Change, the University may require resource consent for more than 250L of sub- Class 3.1C (kerosene) for teaching and research in above ground containers smaller than 450L. Table 17.1 allows the Campus Zone to have 450L of above ground high hazard sub- Class 3.1A and 3.1B in a HSNO 'Type' store, or 450L of lower hazard diesel and petroleum fuel oils (Class 3.1D). The University would ask the Council to increase the threshold for 3.1C liquids to 450L to match the allowance for 3.1A. As medium hazard flammable liquids pose less potential risk to health and safety and the environment than high hazard liquids, it is fair and reasonable to expect the thresholds for each substance to be the same level. **Therefore it is suggested that the threshold for Class 3.1C be reworded as follows '450 litres in approved HSNO 'type' stores' for the Campus Zone.**

8. For Class 4.1.3A-C (solid desensitised explosives), a zero allowance has been allocated for the Campus Zone. It would be problematic if a department had to apply for resource consent if it needed a small amount of a substance of this class for research. The University would therefore suggest that a small allowance of 5 kilograms or less be granted to the Campus Zone for this sub-class. A number of departments do use small quantities of substances of this class and a 5 kilogram allowance would be appropriate to minimise potential compliance costs, given the special circumstances of the scientific research which takes place at the University. **Therefore it is suggested that the threshold for Class 4.1.3A-C materials be raised to '5 kilograms' for the Campus Zone.**
9. For the Campus Zone there is a 20L or 20 kilogram threshold for substances of Class 6.1A-C. This limit would be likely to be exceeded in many departments with laboratories. For example, the Chemistry department has approximately 250 kilograms of 6.1A-C substances, and there are hazardous good cabinets and approved HSNO stores which hold more than 20L/20 kilograms. The University would therefore prefer that this threshold be increased to 100 kilograms or 100L, which should be sufficient for most laboratories. **Therefore it is suggested that the thresholds for 6.1A- C materials be raised to '100L or 100 kilograms' for the Campus Zone.**
10. The limit for Class 8.2A-C substances (Skin Corrosives) is 1000L in the new Table, which is acceptable to the University, but the limit for 8.3A substances (Eye Corrosives) is only 5L. All Class 8.2A-C substances are also Class 8.3A in that anything that is corrosive to skin will also be corrosive to the eyes, as eyes have more sensitivity to chemicals than skin. In contrast, many corrosives which are damaging to the eye are too weak to cause damage to skin. The implications of this discrepancy in the Plan Change are that most skin corrosives will also be subject to the 5L limit, including commercial cleaning products, which are not exempt from the regulations under Note (l) in Rule 17.5.1 as is the case with domestic products.
11. The threshold for Class 8.3A eye corrosives should be increased to the same level as Class 8.2A-C skin corrosives at 1000L to remove this discrepancy in the Plan Change. It is clear that the safety hazard posed by Class 8.3A eye corrosives is the same or less as skin corrosives, and there would be no danger to public safety or the wider environment if both substances were given the same allowance in the Campus Zone and other areas of the city. **Therefore it is suggested that the threshold for Class 8.3A be raised to '1000L' for the Campus Zone.**

We do not wish to be heard in support of our submission.

Signature of submitter:

A handwritten signature in cursive script, reading "Barry Mackay". The signature is written in black ink and is positioned above a horizontal dotted line.

Barry Mackay, Director, Property Services Division, University of Otago

12<sup>th</sup> December 2011



**Teresa Gutteridge**

**From:** Nic Jepson  
**Sent:** Thursday, 8 December 2011 08:29  
**To:** Teresa Gutteridge  
**Cc:** Kirstyn Lindsay  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission  
**Follow Up Flag:** Follow up  
**Flag Status:** Purple  
**Attachments:** T-Parata-Submission-Plan-Change-13.pdf

**From:** Jane Butler [mailto:jbutler@dcc.govt.nz]  
**Sent:** Wednesday, 7 December 2011 10:17 a.m.  
**To:** 'planning@dcc.govt.nz'  
**Subject:** FW: Plan Change 13 - Hazardous Substances Online Submission

**From:** Tony Parata [mailto:tekainga@xtra.co.nz]  
**Sent:** Wednesday, 7 December 2011 10:12 a.m.  
**To:** jbutler@dcc.govt.nz  
**Subject:** Plan Change 13 - Hazardous Substances Online Submission

FROM Tony Parata

Tony Parata has made a submission to the "Plan Change 13 - Hazardous Substances via the online application form. Below are the details of the feedback.

**Your details**

- First name: Tony
- Last name: Parata
- Organisation:
- Street address: 1113 Coast Rd
- Suburb:
- Town / city: 1RD Waikouaiti
- Post code: 9471
- Email address: tekainga@xtra.co.nz
- Day phone: 0274657476
- Evening phone:

**Your submission**

- I Do/Do Not wish to be heard in support of this submission at the hearing: Do
- If others make a similar submission, I will consider presenting a joint case with them at a hearing: Yes
- The specific provisions of Proposed District Plan Change 13 that my I oppose the use of thresholds/ consents to regulate storage and use of hazardous substances because there are now comprehensive HSNO controls. I oppose disposal of

8/12/2011

- submission relates to are:: hazardous substances being a permitted activity
- My submission is that:: See attached
- I seek the following decision from the Council:: See attached
- Attachment: T-Parata-Submission-Plan-Change-13.pdf, type application/pdf, 6.7 KB
- Attachment: No file uploaded

---

If this message is not intended for you please delete it and notify us immediately; you are warned that any further use, dissemination, distribution or reproduction of this material by you is prohibited.

---

Submission Plan Change 13  
Tony Parata

The introduction of HSNO legislation not only changed the classification of hazardous substances but implemented comprehensive controls and regulations relating to the storage, use and disposal of hazardous substances.

As a result there is no need for most of the regulations proposed by the DCC because of the HSNO controls that are now in force.

The District Plan should not provide for disposal of hazardous substances as a permitted activity in any zone. Disposal, as defined in the HSNO Act, should be restricted to appropriate facilities.

In the Rural and Rural Residential Zone there should be no thresholds for Agrichemicals as the safe, responsible and effective management of these is provided for in a much more comprehensive manner under HSNO legislation, specifically: **HSNOCOP 4-2 Management of Agrichemicals**. All users of Agrichemicals are either Approved Handlers or using them under the supervision of an Approved Handler.

Similarly, there should be no requirements in the plan relating to above ground fuel storage in the Rural Zone because this is covered more than adequately the **HSNO Approved Practice Guide Safe Above Ground Storage on Farms October 2010 version 3 April 2008**.

Where industries( including farming) or organisations such as schools or universities are covered by ERMA approved codes of practice or guidelines there should be no further regulations imposed by the District Plan unless the Council can show that HSNO regulations are inadequate for that particular site. The permitted activity status for a zone should reflect this approach rather than using thresholds.

