

3. PROPOSED CANTERBURY NATURAL RESOURCES REGIONAL PLAN – CHAPTER 3: AIR QUALITY

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| Officer responsible Director of Policy | Author Terence Moody, DDI 941-8834 |
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The purpose of this report is to consider the proposals contained in the above document as they relate to Christchurch and to provide for a submission to be presented by the due date of 30 August 2002.

CONTEXT

The Council has, on a number of occasions, clearly expressed the view that action should be taken towards a reduction in air pollution in Christchurch in the winter months particularly. There has been some criticism of the Canterbury Regional Council in the perceived delays in reaching the point of issuing a formal air plan document. The plan was formally released on 1 June 2002 and is available on the Environment Canterbury website at www.ecan.govt.nz.

The Council has made submissions on previous presented proposals and most recently, in February 2002, considered the policy that had been adopted by Environment Canterbury in December 2001 as the basis of the air chapter of the Natural Resources Regional Plan. Representatives of Environment Canterbury had presented their policy and proposals for the air plan to be adopted in June 2002 at a meeting on 20 December 2001 and again at the meeting on 12 February. At the latter meeting the Council also received a presentation and a report from an independent policy consultant, Dr Janice Wright, based on a review of the April 2001 proposal of Environment Canterbury.

At that meeting it was indicated that, while some matters included could be supported, there were a few that caused concerns, notably those relating to the proposal to prohibit solid fuel burning, largely related to wood burning appliances.

The Council indicated that it would support some provisions such as:

- the phasing out of open fireplaces;
- the provisions relating to the phasing out of non-complying solid fuel heaters after 15 years;
- allowing only the installation of "1.5 g/kg" or better solid fuel burners;
- the exemptions for designated heritage buildings;
- provisions relating to motor vehicle emissions and industrial and trade premises;
- support for public information campaigns; and
- the introduction of an assistance and incentives programme.

At that meeting, the request was made for changes to the date by which the prohibition on the use of open fireplaces should be implemented, as well as changes to the provisions relating to the prohibition of solid fuel burners. It was considered that some matters should await the first review of the plan once evidence on the effects of the first steps was known.

THE PROPOSALS OF ENVIRONMENT CANTERBURY UNDER THE AIR CHAPTER

The proposals under the Air Chapter of the Natural Resources Regional Plan are contained in a 251 page document with an accompanying 376 page Section 32 report. While there are a few matters which have been questioned as to their scientific basis, in general, it is considered that the analysis is sufficiently rigorous to support the long known information that air pollution levels in Christchurch are elevated, in relation to PM₁₀ at least, to cause concern. In Christchurch, during the winter months there are a number of exceedances of the 50 µg/m³ (24-hour average) guideline accepted by the Ministry for the Environment.¹

The Council has previously questioned the setting down of the guideline levels as purported "standards" to be met without consideration of the social and economic needs of populations. To this extent the Council has indicated that it would prefer that Environment Canterbury adopted an "incremental approach" as recommended by Dr Wright in her December 2001 report.² This is a matter on which the Council could make a submission.

¹ *Ambient Air Quality Guidelines*, Ministry for the Environment and Ministry of Health, May 2002.

² *Reducing Winter Air Pollution in Christchurch- A Independent Policy Review of Environment Canterbury's Proposed Draft Air Plan of April 2001*, Dr Janice Wright, December 2001

The matters that the Council may wish to make submissions on and which are currently included in the Proposed Plan are the following.

- Policy AQL3 Promote measures to address motor vehicle exhaust emissions [page 3-12]
- Policy AQL4 Restrict outdoor burning [page 3-14]
- Policy AQL5 Avoid odour nuisance [page 3-17]
- Policy AQL7 Avoid agrichemical spray drift [page 3-21]
- Policy AQL8 Control all other discharges to air [page 3-25]
- Policy AQL9 Applying Regional Ambient Air Quality Targets [page 3-28]
- Policy AQL11 Set emission standards for enclosed burners [page 3-32]
- Policy AQL13 Permit replacement of existing solid fuel burners only [page 3-36]
- Policy AQL14 Prohibit open fires [page 3-38]
- Policy AQL15 Phase out older style enclosed burners in the Christchurch Clean Air Zone 1 [page 3-40]
- Policy AQL16 Reduce the number of small scale solid fuel burners in the Christchurch Clean Air Zone 1 [page 3-42]
- Policy AQL17 Provide exemptions for heritage buildings or in emergency situations in the Christchurch Clean Air Zone 1 [page 3-44]
- Policy AQL18 Mitigate adverse financial, social and health effects of clean air policies in the Christchurch Clean Air Zone 1 [page 3-46]
- Policy AQL19 Prevent significant increases in PM10 emissions from large scale fuel burning devices in Christchurch Clean Air Zones 1 and 2 [page 3-47]
- Policy AQL20 Promote measures to address discharges to air from motor vehicles in the Christchurch Clean Air Zones 1 and 2 [page 3-49]
- Policy AQL21 Restrict discharges to air from outdoor burning in the Christchurch Clean Air Zones 1 and 2 [page 3-51]

DISCUSSION

The above matters are those that have been addressed by this Council in the past and it may be that the Council may wish to support both the policies and the rules that arise from them or object to some.

It is intended officers will prepare some draft submissions for consideration by the Council during the next month and it is considered these would be best considered by a Council seminar to obtain some consensus on the final submissions which could be adopted by the Council at its August meeting. Should there be other matters that are considered should be addressed these could be included at that time.

Staff

Recommendation: That the Council consider submissions based on previous Council discussions at a seminar with the intention of confirming its submission at the August Council meeting.

Chair's

Recommendation: That the above recommendation be adopted.