

Christchurch City Council's draft submission on Environment Canterbury's Air Plan Review discussion document

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1. The Christchurch City Council (the Council) acknowledges the effort and achievements by Environment Canterbury in improving the quality of air in Canterbury and the commitment to work with key stakeholders and the public. Along with a reliable source of clean water, healthy air is of considerable importance to the Council and Christchurch residents.
2. Overall the discussion document provides a concise and thorough summary of the history of 'air planning', the key focus of the existing Air Plan and why changes to the Plan are needed.
3. The Council supports the general intent and purpose of the proposed central policy framework given in the discussion document, and the proposed approaches to addressing industry and large scale emissions, nuisance effects, outdoor burning and home heating emissions.
4. The Council acknowledges in particular the challenge of meeting the Government's National Environment Standards for Air Quality concentration limit for PM₁₀ and the timeframe in which the concentration limit is to be achieved. As outlined in the discussion document, the suite of measures across all polluters needed to achieve the concentration limit appears fair and practical.
5. Providing for economic growth while also achieving improved air quality can be difficult to balance. The Council acknowledges this and is encouraged by the policy framework objective to "provide for economic growth in rural and urban areas". Furthermore the recognition of the importance of regionally significant infrastructure for local and regional development and growth is critical for Christchurch.
6. The recognition by Environment Canterbury that land use patterns and careful planning can minimise adverse effects to air quality, is a significant position to take and one that the Council supports. This matter is currently an integral part of the Council's review of the District Plan.
7. The Council specifically supports the introduction of policy to set targets to achieve health based guidelines set by the World Health Organisation for PM_{2.5}. Given that PM_{2.5} makes up a large proportion of PM₁₀ from solid fuel burning, and that solid fuel burning is the most common form of home heating in Christchurch, policy to reduce harmful health effects to people in the long-term, is required.

8. Applying the precautionary approach for assessing any adverse effects from the discharge of hazardous air pollutants where the effects are not predictable because of uncertainty or absence of information is fully supported by the Council. The Council recommends that a precautionary approach, and on a case-by-case basis follows Risk Management Standard AS/NZS ISO 31000:2009, is adopted to help ensure the Air Plan achieves the defined objectives.
9. A 'best practice standards' approach across all polluters as suggested in the discussion document is supported by the Council. This approach will help ensure the responsibility for clean air is shared by all.
10. The Council acknowledges Environment Canterbury's recognition of odour issues and the need for Environment Canterbury to work more closely with District and City Councils. The Council supports Environment Canterbury's intention to investigate differing standards for offensive and objectionable effects between sensitive land uses such as residential and commercial areas and less sensitive industrial or rural areas. The Council recognises the land use planning role it has to manage the co-location of 'incompatible' activities and the support that the Canterbury Regional Policy Statement provides for Council to do this.
11. Prohibiting outdoor burning of waste in urban areas is fully supported by the Council as is suggested buffer zones around residential areas where stubble burning could be more stringently managed. The application of industry guidelines for burning large volumes of tree waste near urban areas is a matter that the Council would encourage Environment Canterbury to pursue.
12. Although the discussion document does not specifically recognise the impact of the 2010/11 Canterbury Earthquakes, the Council acknowledges, given the rebuild, the considerable opportunity to improve air quality through the installation of more efficient home heating devices. For this reason the Council specifically supports Environment Canterbury's proposed encouragement for the development and use of new ultra-low emission burners and non-emitting home heating appliances, the keeping of records where wood burners are in use and, requiring wood burner users to manage their smoke emissions.
13. The discussion document identifies the need to keep homes warm and at the same time to improve air quality. The Council supports Environment Canterbury's recognition of the reliance that many people and households have on wood burners for keeping warm.
14. The intention to make the Air Plan easier to read and understand, as done with the proposed Land and Water Regional Plan, is supported by the Council. This should ensure that the Air Plan is more 'accessible' to a broader range of people and lead to greater adherence to plan provisions and improved air quality.
15. The Council has worked closely with Environment Canterbury on air quality matters over many years and will continue to do this through both informal and formal contact. The Council's Environment Committee and Council staff will continue to meet bi-monthly with Environment Canterbury Commissioners and staff to discuss matters of mutual interest. The Council is likely to submit on the draft Air Plan, when notified, and take part in subsequent hearings.