

29 April 2015

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EC - CHCH	
FILE REF: AR PLAN 1/P/650/2	
DOCUMENT No.:	
01 MAY 2015 62118	ACTION
B Aldridge	INFO

Dear Madam

Timaru District Council (Council) Submission on Environment Canterbury's (ECAN) Proposed Canterbury Air Regional Plan (pCARP)

Council appreciates the opportunity to submit on ECAN's pCARP and acknowledges the resources and effort by ECAN staff and Commissioners in drafting the proposed plan.

Council also acknowledges the extensive communication and engagement that has occurred over the last two years between ECAN and Council in regard to drafting the pCARP.

Council understands ECAN is required through central government legislation to ensure Timaru Districts two current airsheds meet the National Environmental Standards Air Quality. Currently they do not achieve those standards with Timaru in particular exceeding the air standards by a significant margin each year. This submission does not intend commenting on each of Section 32's sections of the pCARP as Council has been informed of ECAN's proposed strategies through the drafting process and has been in agreement with ECAN's move to a more regulatory based methodology. This is in the knowledge that a previously education only based regime has not produced the required reduction in PM10 exceedances in the two Timaru District airsheds.

Timaru District Council therefore supports the measures to reduce the PM10 exceedances to meet the National Environmental Standards Air Quality as outlined in the pCARP.

However Council would like to submit on the following:

- 1) Section 3 Issues and Responses
 That ECAN continue and finalise the process of the splitting of the Washdyke and Timaru airsheds as mentioned in the pCARP. This is essential for Timaru District from an economic development perspective in that the more serious primarily domestic pollution issue in Timaru (an average of over 30 exceedances per year) does not negatively impact on the growth of the Washdyke industrial area which has a far less significant pollution issue (3 -5 exceedances per year), which is primarily due to industrial air pollution.

- 2) Section 4 Evaluation of Proposed Canterbury Air Regional Plan
Council views the 5km buffer zone around Timaru for burning of stubble without the need for a Resource Consent as being too restrictive and would like to see the no burn buffer zone reduced to 2kms.

Council would also like to comment on:

- 3) While the pCARP does not specifically provide for home heating financial assistance for those most vulnerable in the community, Council would like to see the continuation of the current subsidy programme to assist those most in need to upgrade old burners and replace fire places. Council believes the current criteria of applicants/property residents being in possession of a Community Services card is appropriate.
- 4) To ensure the effectiveness of the pCARP and compliance with its regulatory framework Council supports ECAN's proposal to employ appropriate resources in Timaru.

Yours sincerely



Chris English
Group Manager Regulatory Services