

## Make Submission

<b>Consultee</b>	Mr Ian McChesney (60585)
<b>Email Address</b>	mcchesney@inet.net.nz
<b>Address</b>	93 Rattray St Christchurch 8041
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Ian McChesney
<b>Submission ID</b>	pCARP-446
<b>Response Date</b>	1/05/15 3:30 PM
<b>Consultation Point</b>	13 MANDATORY INFORMATION ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

**Please tick the sentence that applies to you:** I could not gain an advantage in trade competition through this submission; or

### To Be Heard

**Please select the appropriate option from the following:** I DO NOT wish to be heard in support of my submission; or

If so

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<b>Submission by</b>	Mr Ian McChesney
<b>Submission ID</b>	pCARP-444
<b>Response Date</b>	1/05/15 3:28 PM
<b>Consultation Point</b>	Proposed Canterbury Air Regional Plan ( <a href="#">View</a> )
<b>Status</b>	Submitted
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### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

The focus of this submission is the proposed Air Plan policies and rules for particulates set out in S6 and S7 in light of the report from the Parliamentary Commissioner for the Environment (PCE) ( *The State of Air Quality in New Zealand* – released March 2015) which concluded New Zealand is basing its air quality policies on the wrong particulate measure and recommending a review of how particulate matter is managed.

The main focus of policies and rules specified for space heating in the proposed Air Plan is for Canterbury airsheds to meet the air quality concentration targets in the National Environment Standard for Air Quality (NESAQ) and the Ambient Air Quality Guidelines . The concentration targets are specified as a date at which only one exceedance of the 24 hour average concentrations of PM10 exceeds 50µg/m3 is allowed per year. For most Canterbury airsheds this date is 2020. Because many Canterbury airsheds currently are grossly in excess of this target the policies and rules in the proposed Air Plan set stringent requirements around the types of burners allowed to be used, phase-out dates for older burners, and prohibition of burning within certain house types.

The PCE report has reviewed the World Health Organisation (WHO) guidance on air quality (from which the NESAQ originally derived). Based on updated evidence the WHO consider that the more important measure of long term health effects is not the short-term exposure to particulates as measured by the 24 hour average concentrations but long term exposure, as indicated by an annual average concentration. Reducing exposure to ultra-fine particulates (up to 2.5µg/m<sup>3</sup>) is also considered more important than the larger particles.

Based on the evidence reported by the PCE, four of the seven Canterbury airsheds would comply now with the WHO long term PM<sub>10</sub> exposure guideline (including Christchurch which would just comply) and the remaining 3 would exceed the guideline by no more than about 35%. This was based on the average concentrations recorded 2010-2012, and would not account for ongoing reductions in emissions in the years since. Knowledge on compliance with the preferred WHO PM<sub>2.5</sub>µg/m<sup>3</sup> guideline for long term exposure is limited by a lack of monitoring. But the one Canterbury site where data was available for 2010-12 (St Albans in Christchurch) showed average annual concentrations only marginally higher than the guideline.

Environment Canterbury is caught in a dilemma. The proposed Air Plan has obligations to meet NESAQ targets, and it is clearly focused around achieving these. But the PCE report casts serious doubt on the veracity of current NESAQ targets and recommends a review. The NESAQ targets are established by central government, and any change to the target must be made at this level.

The implications for the proposed Air Plan are not trivial. Under currently policies and rules many tens of millions of dollars of household investment in new heating appliances will be required across the region over the next 5 years. There may also be a detrimental reduction in warmth for some households if they are required to adopt non-solid fuel heating options. If, after review, a long term PM<sub>2.5</sub>µg/m<sup>3</sup> exposure standard was deemed as more appropriate (or perhaps some mix of both short and long-term exposure), then based on the PCE information reported the policies and rules for air quality management in the seven Canterbury airsheds would be quite different to those currently proposed, and on average considerably less stringent.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

The PCE report was released in March and no doubt Environment Canterbury will be fully aware of the implications of the PCE's recommendations on the proposed Air Plan. Indeed, ECan's own background reports commissioned for the proposed Air Plan have highlighted the issue. In this light, what should Environment Canterbury do?

A preferred course of action is in the first instance for Environment Canterbury to acknowledge the PCE findings, and to state its position on the PCE recommendation for a review. This leaves open the possibility that Environment Canterbury may disagree with the substantive findings of the PCE's report. If so, it would be vital for the public to know this, to know why, and by implication to know why the proposed Air Plan should proceed in its current form (or largely so). If, on the other hand, Environment Canterbury is broadly in agreement with the science behind the PCE's report, it should be supporting the call for a review of how particulate matter is managed. It should be calling for this review urgently because of the uncertainty now created about the management of air quality in New Zealand. In the meantime the enforcement of the stringent policies and rules around particulate management in the proposed Air Plan should be relaxed until there is clarity around the future management regime.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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<b>Address</b>	93 Rattray Street Riccarton Christchurch 8041
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Ian McChesney
<b>Submission ID</b>	pCARP-1833
<b>Response Date</b>	1/05/15 3:28 PM
<b>Consultation Point</b>	Space heating in Clean Air Zones ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.5
<b>Support Oppose</b>	
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*Please summarise decision requested*

#### **Planner - Summary of Decision Requested**

Amend the space heating rules and policies to relax the requirements for upgrading appliances until there is clarity around possible changes to the National Environmental Standards for Air Quality.

**Air Shed**

**Which Air Shed does this submission relate to or none** . Not Air Shed Related

**Choose one of the following three** . Recommend Accept in Part

**Tick relevant topics**