

Tabled at Hearing - 27.10.2015.  
R.G. Brittan

#### PROPOSED AIR PLAN - 2015

I am Richard (Dick) Brittan, a Licensed Cadastral Surveyor and my home is at 161 Lehmans Road in what is Clean Air Zone 2 of the existing plan for Rangiora. I note that technical submissions have been made by well qualified persons so I will not submit on the technical faults of this proposed plan. In its present form it might be more appropriate to refer to the Anti-environment Regional Council as this plan is designed to increase the use of fossil fuels and waste the resource of good 15 year old wood burners and fire wood. It appears that the legislation is at fault and your time would be better spent in an effort to have this updated which was expected at the time of the previous plan for Rangiora, see Rule AQL22(k).

The plan states that ECan can not reduce the pollution from vehicles when in fact significant progress has been made including the introduction of less polluting busses. My wife's experience many years ago in Manchester is relevant. The creation of a clean air zone did little to clear the smog, but the construction of a bypass had a very significant effect.

We left Christchurch as my son is asthmatic and was frequently very ill. He has no problem in Rangiora and enjoys a rubbish fire. Humans have lived with wood smoke for thousands of years. I have lived with the smoke from the inside cooking fires that were kept going in the evening to keep the bugs away, but the City fumes are a different matter.

Submissions on the present plan for Rangiora closed on 7 December 2007. Our final Consent Order affecting the Rangiora Clean Air Zone 2 was approved by the Environment Court on 19 May 2010 and the plan became operative on 11 June 2011. The submissions, hearing and appeal involved considerable costs to the objectors in the preparation and consultation for their submissions to the Environment Court and again as ratepayers to cover ECan's costs. To now find that with no clear notice this agreement is to be over-ridden by Council with new rules substantially the same as the ones that they agreed to change on appeal amounts to a lack of due process and may well be considered as Contempt of the Environment Court so I assume that this must have been an oversight.

The proposed rules are proscriptive rather than effect based. An interesting example is rule 7.10.4 which allows burning if the wind speed is between 1 and 15 km per hour while the previous proposal was to allow burning only when the speed was above force 4 which is about 20 km per hour. Neither rule is workable or relates to the actual effects which are dependent on other factors.

Rule 7.10.5 allows only 2 adjoining properties to work together. One good fire produces less smoke than several small ones so this rule appears to be intended to increase pollution.

I note and generally support the large number of changes requested by the Waimakariri District Council.


I note that once again the public notice appears to fall well short of what the RMA required by the terms "such further information" for this rather major change as it affects our property. As with the previous plan I would expect the Courts to accept that this change has not been properly notified, but the costs to the rate-payers of taking this action would be considerable.

My understanding is that there have been few exceedencies in Rangiora of the 50 average and these by only a small amount for a site that may well be one of the more polluted areas in Rangiora. My son complains of the smell of coal smoke in that area and I suspect that further

work by the "smoke police" will reduce the PM10s to within the allowable limit without increasing the restrictions on the Rangiora Clean Air Zone 2. I doubt that this proposed change would have significant effect on the monitoring site. The chart below shows that in general Rangiora is well below the 50 threshold and if the bar was lifted to the higher level of many overseas countries Rangiora would be below the bar.

In summary, I request that the agreed rules for Rangiora Clean Air Zone 2 be reinstated and so avoid the costs to submitters and ratepayers of going once again to Court

Remove rules with adverse environment effects including the restriction on combining property fires and destruction of good 15 year old wood burners.

  
R G Brittan  
October 2015

