

*Tabled @ Hearing
24.11.2015
D + P FOSTER
Family
Trust*

**SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN
PRESENTATION TO HEARING COMMISSIONERS, 24th NOVEMBER 2015**

Overview:

My name is Donald Foster and I am speaking today in support of my submission dated 22nd March 2015 which I understand you have read.

In particular, I made the points that in a rural area with tree windfall/maintenance and hedge trimming, the most practical method of debris disposal is burning, and argued that the significant additional cost of ULEB burners in a rural-land zoned area could not and had not been justified, and should not be gratuitously imposed.

Background:

1. Lansdowne Valley has a catchment of some 2500 acres. Part is in Selwyn District Council territory which is rural-land zoned without air zoning; to the East at the top is Banks Peninsular, which is zoned Rural Hills without air zoning, and part is within the CCC territorial boundary (comprising land zoned Rural Hills, Rural 2, and a narrow strip adjacent to Kennedys Bush Road on the top of the spur zoned Living Hills A and B), with the CCC portion of the valley classified under the current air plan as air-zone 2.
2. Kennedys Bush Spur (on the north side of the valley) forms a physical demarcation line (barrier) – to the north of it lies Christchurch city with the Port Hills facing north-west. To the south of it, the Port Hills,

including Lansdowne Valley face west opening onto the rural land to the south and west within Selwyn district.

The prevailing winds are from the North East and North, blowing toward non air-zoned rural land outside the CCC territorial boundary.

In the 40-plus years I have lived in the valley, I have yet to see smoke lifting over Kennedys Bush Spur and drifting toward the city.

3. The current air plan introduced a clean air-zone 2 rating to the CCC portion of the valley, and I imagine the rationale for this was simply to ensure that within CCC territorial boundaries, all land was allocated an air-zone rating. I can find no current science justifying the need for an air-zone in Lansdowne Valley¹ and now that Banks Peninsula is also part of CCC responsibility and without an air-zone rating, the precedent exists to defer to practical experience and common sense by removing the air-zone from Lansdowne Valley. The predicament is possibly even more absurd – I could not find an air-zone “2” rating in the Proposed Plan, and suspect that part of Lansdowne Valley has therefore morphed by default into air-zone 1, while much of the valley catchment has, understandably, no air-zone rating at all.

¹ For example; where is the scientific evidence presented in support of the air-zone boundaries for the new rules? Where does the plan show what the contribution of an NES compliant burner in Lansdowne Valley is to air quality in Christchurch? Where are the scientific reports that justify the introduction of ULEB?

Other Relevant Issues:

In addition to points raised above, the following points should be recognised:

1. There is only a scattering of houses in the valley. Most residents actively farm the land and have the same need to dispose of tree shedding and hedge trimming. Carting this to some dumping area or chewing through it with large diesel-powered chippers are not solutions that are cost effective, environmentally friendly, or smart. Neighbours have a mutual interest in periodic burning of this material.
2. Although the area is rural, the tree/vegetation density is higher than for many rural areas, and readily provides wood for log-burner fuel. With low residential density there can be no justification for upgrading the current NES log-burner regulations to ULEB. As noted the prevailing winds do not blow toward Christchurch and in any event the distance from Lansdowne to the urban smog area of Christchurch makes over-regulation of this area unnecessary. Unrestricted ULEB burners emitting 0.5g/kg (possibly 1g/kg real life) in polluted central Christchurch areas must have more impact than a handful of NES burners emitting 1.5g/kg (possibly 4.5g/kg real life) 10 kilometres south of it – or say 5km if you want to argue Halswell should be included.
3. The deposition of pollutants from the higher tree/vegetation density further mitigates against detriment to the valley and environs and to more distant urban areas.

Show me the list of complaints over the last decade from Lansdowne residents or from residents in surrounding areas complaining about smoke effects from Lansdowne Valley.

Summary:

Lansdowne Valley is basically a rural-zoned low residential density area physically isolated from the Christchurch smog problem. The imposition of an air-zone with its attendant high log-burner compliance costs and impracticality of dealing with tree shedding, simply as a CCC territorial mapping convenience without robust scientific justification, is not acceptable.

The valley land in CCC territory zoned Rural Hills and Rural 2 should be excluded from the air zoning just as the Selwyn portion of the valley catchment has been correctly excluded.

The decision I am requesting from the Commissioners is that no air-zone is applied to land zoned Rural Hills or Rural 2 in Lansdowne Valley.

Thank you for the opportunity to make this request.

Donald Foster,

pp. D & P Foster Family Trust

24th November 2015