

Attachment B

11th May 2018

Otago Regional Council
Freepost 497
Private Bag 1954
Dunedin 9054

Via email: info@orc.govt.nz

Dear Sir / Madam,

RE: QLDC SUBMISSION – AIR QUALITY

Thank you for the opportunity to present our submission in relation to the Otago Regional Council's Air Quality Strategy.

We are keen to be heard in relation to our submission, should the opportunity arise.

Yours sincerely,



Mike Theelen
Chief Executive
Queenstown Lakes District Council



Jim Boulton
Mayor
Queenstown Lakes District Council

1.0 INTRODUCTION AND CONTEXT

- 1.1 The vision of Otago Regional Council's Draft Air Quality Strategy (the Strategy) is for Otago to have clean air everywhere. The four desired outcomes of the Strategy are cleaner heating, reduced reliance on outdoor burning, no nuisance from emissions and no toxic emissions impacting on people and ecosystems. The Otago Regional Council has proposed key actions to achieve these desired outcomes within set timeframes.
- 1.2 The implementation of this strategy through these key actions has the potential to change the resource management approach of the Queenstown Lakes District Council (QLDC) District Plan, with respect to land use and other activities that effect air quality in the district.
- 1.3 This submission summarises the opinions of QLDC Officers in relation to the Strategy, specifically proposals that would trigger changes, in both the operative or proposed District Plans, and affect how it's administered.

2.0 GENERAL COMMENTS

- 2.1 In order to meet the desired outcomes of the Strategy, QLDC supports collaborative actions between the Otago Regional Council and Otago's Territorial Authorities, in order to prevent the nuisance effects of air pollution and manage the effects of urban growth on air quality.
- 2.2 The Strategy states that "*in time, air quality issues will be resolved*" (p.3). QLDC Officers would like to express concern over the vagueness of this approach, and its lack of a definitive timeframe. It would be useful if the strategy could outline its context within the wider policy approach for air quality management, in particular its linkages, and how it seeks to give effect, to the National Environmental Standard for Air Quality (Resource Management Regulations 2004). A timeframe for delivery should also be provided.
- 2.3 The Strategy states that the Otago Regional Council "*will advocate for adequate controls in district plans and other relevant legislation to prevent nuisance activities*" (p.12). QLDC supports this action, as it seeks to ensure that submissions are made on relevant city and district plans to ensure that they are not inconsistent with any higher level plans for the management of air quality.
- 2.4 QLDC supports the recognition that there is rapid growth in Central Otago towns situated where air inversions occur. It would be useful if this recognition could be expanded to acknowledge Wanaka and other towns in the Queenstown Lakes District where inversions also contribute to lower air quality at certain times of year. These towns are also experiencing rapid growth, and will require specific consideration in the management of Otago's overall air quality.
- 2.5 It would be beneficial for the Strategy to include up-to-date data on air quality indicators across the Otago Region, for example, average PM10 levels and exceedances¹. It would also be good to include

¹ Ministry for the Environment. (2003). Health Effects of PM10 in New Zealand. Air Quality Technical Report No. 39. Retrieved from: <https://www.mfe.govt.nz/sites/default/files/air-quality-tech-report-39-aug03.pdf> on May 8, 2018

target levels with respect to the Ministry for the Environment's ambient air quality guideline values of 50 ug/m³ (24 hour average) and 20 ug/m³ (annual average)¹ and other environmental health indicators.

- 2.6 Officers note that the effects of traffic congestion on air quality were not specifically addressed in this strategy, which may create a gap in the policy approach to achieving better air quality in Otago. If the effects of traffic congestion on air quality is addressed through other regional plans or strategies, this should be noted in the document.

3.0 QLDC DIRECT RESPONSE TO THE PROPOSED AIR QUALITY ACTIONS

- 3.1 QLDC officers have identified certain actions proposed in the Strategy which will affect the ongoing development and administration of the QLDC District Plan. These actions also have the potential to trigger a review or update of the operative (and proposed) District Plans to ensure that these give effect to regional policy documents.
- 3.2 Action 1: *"Review policies and rules on emissions from new buildings and outdoor burning within urban areas"* (p.3, p.14). This action has a timeframe of three years and seeks to ensure Outcome 1 of the Strategy is achieved. QLDC officers support this action, but suggests that a shorter timeframe is more appropriate, given the rapid growth of certain urban areas within the Otago Region.
- 3.3 Action 2: *Review policies and rules on outdoor burning within and around urban areas"* (p. 15). The Strategy states that this should occur within 3 years, and seeks to ensure outcome 2 of the strategy is achieved. QLDC officers support this action, and seek that such policies and rules are reviewed so that they are relevant to the effective assessment and control of outdoor burning activities within the rapidly expanding urban and peri-urban areas of the district.
- 3.4 Action 3: *"Collaborate with city and district councils to manage the effects of urban growth on air quality"* (p.3, p.14). The Strategy states that this will occur from 2020. There is significant urban growth in the Wakatipu Basin and Wanaka areas that will happen before this time. QLDC Officers are of the opinion that the planned collaboration between QLDC and the Otago Regional Council needs to commence as soon as is practicable. The Strategy also notes that earthworks, roads and other land uses generate dust, and seeks that dust is effectively controlled (Outcome 3).'
- 3.5 Action 4: *"Research the environmental impact of chemical use in Otago"* (p.15). The strategy states that this should occur within 10 years. QLDC supports the recognition of the effect of spraying from horticulture and viticulture activities, as these are significant land use activities within the district and supports the Strategy's requirement that spraying activities occur in a targeted and controlled way (Outcome 4).
- 3.6 Officers have also noted that the desired outcomes have been stated in an ambiguous way, and that the processes that consenting territorial authorities will need to incorporate into their operations with respect to air quality should be further explained by the Strategy. It would be particularly useful if the Strategy or an accompanying document would give more guidance on consent conditions that

would ensure that the desired outcomes of improving air quality and clean air everywhere are to be achieved.

- 3.7 Relevant data on the region's air quality is not present in the Strategy, and the inclusion of such data would be a great improvement. It would help focus efforts on key tasks that would improve air quality in Otago.

4.0 RECOMMENDATIONS AND SUMMARY

- 4.1 QLDC supports the actions and desired outcomes of the ORC's Draft Air Quality Strategy. As outlined above, the following key changes are recommended:

- That the strategy's overall statement, that "in time, air quality issues will be resolved" is reviewed to include measurable air quality indicators and a realistic timeframe.
- That the Strategy outlines its context and timelines within the wider policy approach for air quality management, in particular how it seeks to give effect, to the National Environmental Standard for Air Quality (Resource Management Regulations 2004).
- That Wanaka is specifically acknowledged as a place where temperature inversions lead to lower air quality at certain times of year, so that future policies seeking to address Wanaka's air quality have the relevant strategic background to do so.
- That relevant quantitative data for Air Quality indicators and trends are clearly linked to the goals and incorporated into the Strategy.
- That the effects of traffic congestion on Otago's air quality is acknowledged and effectively incorporated into this Strategy.
- That the strategy incorporates more guidance on consent conditions that would ensure that the desired outcomes of improving air quality and clean air everywhere are to be achieved.