

Further Submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

The Chief Executive
Bay of Plenty of Regional Council
PO Box 364
Whakatāne 3158
EMAIL: air@boprc.govt.nz

- 1- I wish to be heard in support of my further submission
- 2- If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing
- 3- I am a person representing a relevant aspect of public interest, namely avoiding adverse effects on public health

Address for service: 6 DeHavilland Way
Tauranga 3116

Telephone: 027 2412777

Email: james@pengelly.co.nz

Contact Person: James Pengelly

BOPRC Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

Submission Type: Support with amendment

Submitter: James Pengelly, 6 De Havilland Way

Submission:

This submission concerns matters which are relevant to the public interest, namely avoiding adverse effects on public health. I am the owner of a hangar facility intended for aircraft storage and pilot accommodation. The facility is located 6 De Havilland Way, Tauranga Airport. Since 2012 my tenants have been subject to adverse health effects arising from discharges to air of particulate matter which daily crosses the boundary from a nearby bulk materials handling facility located 101 Aerodrome Road.

An independent investigation commissioned for Toi Te Ora concludes: (Emission Impossible Ltd, 2018)¹

“...dust emissions from the bulk materials activities at 101 Aerodrome Road are having adverse health effects on workers and residents in de Havilland Way. These effects are intermittent and appear to coincide with dry, windy conditions and a lack of effective dust control at 101 Aerodrome Road. The effects range from minor (e.g. sore throat, itchy eyes) to serious (e.g. allergic bronchitis).”

Additionally the Toi Te Ora report outlines a broad range of adverse health effects arising from exposure to particulate matter. This is summarised as:

In summary, PM10 causes both acute and long-term health effects and is carcinogenic. It should be treated seriously and not just considered as ‘nuisance’ dust.

I submit;

- 1- In support of proposed AQ R1 as it is currently drafted. AQ R1 requires discharges to air should not cause adverse effects beyond the boundary of a site where any activity is being undertaken. Importantly AQ R1(c) provides that any activity on industrial or trade premises that has discharges to air that have adverse effects offsite, such as 101 Aerodrome road, will now require resource consent, I strongly support this.
- 2- I seek an amendment; that monitoring be carried out for PM10 size particulate in accordance with the Resource Management (National Environmental Standards for Air Quality)

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- 3- I oppose “Proposed Plan Change 13 – Air Quality” amendments sought by the following parties: (submission numbers in brackets)

Submitter Name	Submission number
Oji Fibre Solution	(37)
Silver Fern Farms Management Ltd	(63)
Port of Tauranga	(67)
KiwiRail Holdings Ltd	(69)
Swap Stockfoods Ltd	(75)
Federated Farmers of New Zealand	(76)

Commercial Pilots who use the hangar accommodation must meet stringent medical criteria to maintain a valid commercial license. I am aware of individuals in adjacent buildings whose health, as a result of breathing air contaminated by particulate from 101 Aerodrome road, has deteriorated to the point where they may no longer meet the medical criteria. I note there has been little effective action on the part of BOPRC to stop dust crossing the boundary into my hangar facility which is hugely disappointing. I feel amendments sought by the above 6 industries will further **“Reduce” Councils ability to properly regulate**. Most concerning is that my “duty of care” to provide a safe environment for hangar users will continue to be undermined by a continuation of toxic organic dust crossing the boundary from 101 Aerodrome road.

FURTHER SUBMISSION POINTS:

Submission Number <i>[Submission number of original submission as shown in the "Summary of Decisions Requested" report]</i>	Submitter Name <i>[Please state the name and address of the person or organisation making the original submission as shown in the "Summary of Decisions Requested" report]</i>	Section Reference <i>[Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposed plan change]</i>	Support/Oppose	Reasons <i>[State in Summary the nature of your submission giving clear reasons]</i>
(37)	OJI FIBRE SOLUTIONS	1,6,7,9,13,15,16	Oppose	Refer to my Further Submission FS15 (02-08-18)
(67)	PORT OF TAURANGA	2,3,6,7,8,15,18,20,22	Oppose	Refer to my Further Submission FS15 (02-08-18)
(63)	SILVER FERN FARMS MANAGEMENT LTD	1,2,3,4,5,6,7,8,9,10,11	Oppose	Refer to my Further Submission FS15 (02-08-18)
(69)	KIWIRAIL HOLDINGS LTD	4,8	Oppose	Refer to my Further Submission FS15 (02-08-18)
(75)	SWAP STOCKFOODS LTD	1,3	Oppose	Refer to my Further Submission FS15 (02-08-18)
(76)	FEDERATED FARMERS OF NEW ZEALAND	1,3,7,8,16,23,36,37,42	Oppose	Refer to my Further Submission FS15 (02-08-18)

Note: A copy of your submission must be served on the original submitter within 5 working days after making this further submission