

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

Clause 8 of Schedule 1, Resource Management Act 1991

Please send your submission to be received by 4:00 pm on 31 July 2018

Further Submission Number
Office use only

FS16

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

Name: Solo Wings Ltd (Colin Alexander)
[Full name of the person or organisation making the submission]:

This is a further submission in support of or opposition to a submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

1. I do or ~~do not~~ wish to be heard in support of my further submission.
[Delete as required]
2. If others make a similar submission I **would** or ~~would not~~ be prepared to consider presenting a joint case with them at any hearing.
[Delete as required]
3. I am:-
[Please tick one]
 a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category.)
 a person who has an interest in the proposal that is greater than the interest the general public has. (Specify upon what grounds you come within this category.)

On the following grounds:

Please Refer to attached submission

Signature [of person making submission or person authorised to sign on behalf of person or organisation making submission].
A signature is not required if you make your submission by electronic means]

Address for Service [Provide full postal details]:

P.O. Box 13367 Tauranga 3141

Daytime: 07574 7973 After Hours:

Colin@Solowings.co.nz

Email: Colin Alexander (Managing Director)

Contact person [Name & Designation if applicable]:

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

FURTHER SUBMISSION POINTS:

Submission Number [Submission number of original submission as shown in the "Summary of Decisions Requested" report]	Submitter Name [Please state the name and address of the person or organisation making the original submission as shown in the "Summary of Decisions Requested" report]	Section Reference [Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposed plan change]	Support/Oppose	Reasons [State in Summary the nature of your submission giving clear reasons]
37	OSI Fibre Solutions	37-1 6 7 9 13 15 16	oppose	Please refer to attached Submission
67	Port of Tauranga	67-2 8 22 3 15 6 18 7 20	oppose	
69	Kiwi Rail Holdings	69-4 -8	oppose	
63	Silver fern farms management Ltd	63-1 to 63-11	oppose	
75	Swap Stockfoods Ltd	75-1 to 75-3	oppose	
76	Federated Farmers of New Zealand	76-1 36 3 37 7 42 8 16 23	oppose	

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

BOPRC Proposed Plan Change 13 – Air Quality

Submission Type: Support with amendment

Submitter: Solo Wings limited (Colin Alexander), 2 De Havilland Way

Submission:

This submission concerns matters which are relevant to the public interest, namely avoiding adverse effects on public health and equipment. Solo Wings (Aircraft Maintenance facility) is located 2 De Havilland Way, Tauranga Airport. As a direct result of working at 2 DeHavilland way I have been subject to serious adverse health effects arising from discharges to air of particulate matter from an adjacent bulk materials handling facility located 101 Aerodrome Road, Mt Maunganui. Adverse effects also include health of my employees, economics of my business, and damage to paint and windows of customer's aircraft.

I submit;

- 1- In support of proposed AQ R1 as currently drafted. This rule requires discharges to air should NOT cause adverse effects beyond the boundary of the site where any activity is being undertaken.
- 2- In particular Support of Rule AQ R1(c) which provides that any activity on industrial or trade premises that has discharges to air that have adverse effects offsite, such as 101 Aerodrome road (which has caused serious adverse effects at mine and other properties), will now require resource consent.

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- 3- For effective enforcement of this rule, I seek that monitoring be carried out for PM10 in accordance with the Resource Management (National Environmental Standards for Air Quality)
- 4- To register my **strong opposition** to “Proposed Plan Change 13 – Air Quality” amendments sought by the following parties: (submission numbers in brackets)
- **KiwiRail Holdings Ltd** (69)
 - **Oji Fibre Solution** (37)
 - **Port of Tauranga** (67)
 - **Silver Fern Farms Management Ltd** (63)
 - **Federated Farmers of New Zealand** (76)
 - **Swap Stockfoods Ltd** (75)

In my experience, for the past 5 years, there has been a demonstrable lack of regulatory action by BOPRC in dealing with the adverse effects caused by discharges from the neighbouring bulk materials handling facility at 101 Aerodrome Road. There is considerable evidence of adverse effects from these discharges which is supported by an independent investigation commissioned for Toi Te Ora. The report concludes that: (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

¹ Emission Impossible Ltd, (2018). *Dust Investigation: 101 Aerodrome Rd, Mt Maunganui*. Report prepared for Toi Te Ora. 10 May. Auckland. p 39.

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Aerodrome Road. The effects range from minor (e.g. sore throat, itchy eyes) to serious (e.g. allergic bronchitis).”

Additionally Toi Te Ora’s report outlines a wide range of adverse health effects that can arise from exposure to particulate matter, 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.

Clearly something has to change; BOPRC has recognized this in the proposed plan change-13. The abovementioned parties seek amendments, I feel, will further frustrate BOPRC’s ability to effectively perform its regulatory role. Tauranga Airport is a public area. General public are subject to breathing contaminated air, as a consequence of 101 Aerodrome road particulate discharges, as I and my employees have been. It would clearly run counter to the public health interest for BOPRC to adopt these amendments.

¹ Emission Impossible Ltd, (2018). *Dust Investigation: 101 Aerodrome Rd, Mt Maunganui*. Report prepared for Toi Te Ora. 10 May. Auckland. p 39.