

26 September 2024

Otago Regional council
Philip Laing House
Level 2
144 Rattray Street
Dunedin 9016
Via email: Policy@orc.govt.nz

Tēnā koutou

DUNEDIN CITY COUNCIL SUBMISSION ON THE OTAGO REGIONAL COUNCIL AIR QUALITY MANAGEMENT REVIEW

Introduction

1. The Dunedin City Council (DCC) welcomes the opportunity given by the Otago Regional Council (ORC) to submit on the Air Quality Management Review (the Review).
2. The DCC recognizes the importance of having clean air to breathe and the impact of poor air quality on human health. The HAPINZ 3.0 study published in 2022 concludes that in 2016 poor air quality caused more than 3,300 premature deaths, more than 13,000 hospitalisations for cardiovascular and respiratory disease, and 13,229 cases of childhood asthma.
3. Poor air quality also impacts plant growth by weakening photosynthesis thus affecting food security, as well as the general amenity and experience of being outdoors, and culturally significant wāhi/locations throughout Otago, particularly, mahika kai (traditional food, their sources and methods of gathering) sites that can be impacted by low air quality hence leading to cultural offence.
4. The DCC also acknowledges that improving air quality will also benefit biodiversity and the environment generally and actions to improve air quality can have co-benefits in terms of emissions reduction, supporting both the DCC and the ORC's climate mitigation aspirations.
5. In 2021/2022¹, transport generated 34% of Dunedin's gross greenhouse gas emissions. Stationary energy generated 12%, of which 19% was attributed to coal burning. The DCC's Zero Carbon Plan 2030 sets out the key shifts that Dunedin needs to become a Zero Carbon city. Some of the key shifts include the phase out of coal burning, increases in public and active transport, and continuation of fleet electrification.
6. The DCC underlines that Māori generally experience disproportionately poorer health outcomes than Pākehā that may be worsened through inadequate air quality.
7. This submission supports the Otago Regional Council's (ORC) general approach and raises some specific points of attention related to air quality monitoring, DCC's commitment to the Treaty of Waitangi, waste management, agricultural spraying, housing and transport.

Submission

¹ *Dunedin city Community Carbon Footprint 2022*, AECOM New Zealand Limited, 21 December 2022

Air monitoring

8. The DCC calls for reinstatement of active air quality monitoring in Dunedin and requests the supply of up-to-date data on the ORC website.

Mana whenua engagement

9. The DCC notes that tikaka Māori and principles of the Treaty of Waitangi are noted in 7.1 of the current Plan but are also needed under Part II of the Resource Management Act 1991. Furthermore, te ao Māori informing policies and plans is an important goal for mana whenua.
10. The DCC underlines it would be beneficial to note what type of structure papatipu rūnaka/marae fall under (residential, commercial, etc.), and if there is a separation between the marae and, for example, adjacent kaumātua housing.

Waste

11. The DCC supports the proper disposal of rubbish in rural areas rather than outdoor burning.
12. The DCC notes that it would be unrealistic and uneconomic for city/district councils to extend additional services for waste collection into predominantly rural areas where most of the outdoor burning occurs. The ORC would need to apply sufficient resource to education campaigns and require alternatives to burning where practicable (e.g., composting, mulching).

Housing

13. The DCC proposes a system of warnings or fines to be issued if residents continue to use solid fuel burners for which issues have been identified (e.g. after a complaint) and not fixed.
14. The DCC notes that in some areas, solid fuel burners may not be appropriate due to the smoke sitting in a valley or in under an inversion layer which causes health issues for residents. In these areas complete bans on new installations should be considered alongside some support to install alternative methods of affordable and reliable heating.
15. The DCC supports interventions to reduce coal burning. In general, replacing poor performing heat sources and encouraging the use of alternatives is a useful incentive to support progress on Zero Carbon targets.
16. The DCC supports financial incentives to support transitioning into cleaner heating sources, noting that a number of people in our community are struggling financially. The DCC also encourages the impact of regulatory change on lower income households to be fully considered and adverse impacts minimised.
17. The DCC supports education programs to promote good use of solid fuel burners, particularly focusing on what can and can't be burnt (e.g. rubbish, plastic).

Agricultural spraying

18. The DCC notes that agricultural spraying is also a factor affecting air quality and would like for this issue to be included in the ORC's approach.

Transport

19. The DCC submits that to decrease vehicle emissions from private vehicles, an increase in reliable and affordable public transport that connects suburbs with the central city and other employment hubs is needed.
20. The DCC encourages an assessment of the viability of introducing increased electric bus services to enable mana whenua to live within their papakāika/communal Māori land, while staying connected to the central city without needing to rely on private vehicles.
21. The DCC also encourages – as soon as funding allows – the consideration of expansion of the public transport network into un-serviced outlying townships, such as Outram, and the increase in frequency of services to outlying communities and current serviced parts of Dunedin, such as the newer developed parts of Mosgiel and other urban expansion areas, or the Waikouaiti coast. This is sought in addition to the current focus of fares and frequency in higher density areas.
22. The DCC would also support measures to reduce vehicle idling, such as education initiatives, clear visual material in designated places, or enforcement programs.

Conclusion

23. The DCC thanks the Otago Regional Council for the opportunity to submit on the Air Quality Management Review.
24. The DCC will continue to assist with ensuring that the Air Zones include areas that have been rezoned through the Second Generation Plan (2GP) and subsequent variations.
25. The DCC welcomes the opportunity to speak to this submission at any hearings.

Kā mihi



Jules Radich
MAYOR
DUNEDIN CITY COUNCIL