

Guidance Note for Discharge to Air Applications in a coastal environment



Completing the application form to discharge contaminants?

Please supply more information about your proposed discharge to air.

Please provide an appropriate level of information relative to the scale of your activity. If you seek resource consent for an infrequent air discharge located near other similar land uses, your description might fit in the space on Form B - you can probably do it yourself.

However, if you seek consent to establish a new activity in a polluted airshed¹, you need to provide detailed information. You will likely have to engage a technical consultant to model the effects of your proposed activity. Writing 'Not Applicable' isn't enough. You need to add some comment, such as: 'My proposed air discharge complies with Objective 16 because I will take the following actions to avoid adverse effects of my air discharge offsite...'

Only particularly relevant parts of policies and objectives are shown here. Full text, relevant objectives and policies are at: <http://www.hbrc.govt.nz/our-council/policies-plans-strategies/rmp/>

1. Sustainable management (RMA, Part 2)

The purpose of the Resource Management Act is to promote the sustainable management of natural and physical resources. Your proposed activity must use natural and physical resources in a way or at a rate, to enable people and communities to provide for their social, economic and cultural well-being, and for their health and safety. Your proposed activity must also:

- sustain the potential of natural and physical resources to meet the needs of future generations; and
- safeguard the life-supporting capacity of air, water, soil, and ecosystems; and
- avoid, remedy or mitigate any adverse effects of activities on the environment.

Please explain why you think your proposed discharge of contaminants to air is sustainable

2. Relevant legislation (Section 104(1)(b))

Regional Policy Statement (RPS)

- New air discharges

Objective 16: applicants must take actions to avoid or mitigate off-site effects of the discharge or nuisance effects in areas where it may conflict with existing land use activities. Objectives 17 and 18: applicants must do the same thing for existing air discharge activities (including their expansion).

- Odorous air discharges

Policy 8: applicants must have regard to how often and how long odour events occur, the nature of the odour, the nature of the local environment where the odour may be experienced and reasonable expectations for amenity values in that zone, environmental factors contributing to potential effects, i.e. climate, and operation in a manner that adopts the best practical option.

- Iwi and hapū considerations

Objectives 34-37 and Policies 64-66 in the RPS give a framework that recognises matters of significance to iwi/ hapū and the actions to consider concerning resource consent applications. This includes

¹ Information about airsheds and air discharges is online at www.hbrc.govt.nz, keyword search: #airquality

avoiding significant adverse effects on waahi tapu (sacred places), tauranga waka (landings for waka), taonga raranga (plants used for weaving and resources used for traditional crafts), mahinga kai (food cultivation areas) and recognising the importance of the relationship of Māori with coastal, lake, wetland and river environments.

Regional Coastal Environment Plan (RCEP)

Objective 14.1: aims to maintain or enhance *ambient* air quality so that it is not detrimental to human health, amenity values or the life-supporting capacity of air and meets National Environmental Standards. Objective 14.2: aims to maintain a standard of *local* air quality that is not detrimental to human health, amenity values or the life-supporting capacity of air.

Objectives 14.3 and 14.4 aim to improve ambient air quality so that the concentration of PM₁₀ does not exceed 50 ug/m³ (24 hour average) more than once in any 12 month period. In the Napier, Hastings, Awatoto and Whirinaki Airsheds this does not have to be achieved until 1 September 2020; outside of those airsheds, the limit applies now.

Policy 14.1: sets out environmental guidelines and standards for air quality, as does Policy 69 of the RRMP, with the following exceptions:

Issue	Guideline
1. Odour	There should be no offensive or objectionable odour beyond the boundary of the property.
2. Gases, airborne liquid, other noxious or dangerous contaminants	There should be no noxious or dangerous levels of gases or airborne liquid or other airborne contaminants beyond the property boundary, in concentrations and at locations likely to cause adverse effects on human health, terrestrial or aquatic ecosystems or property.
3. Smoke and water vapour	The discharge should not result in any smoke, water vapour or other contaminant that adversely affects navigation, traffic safety, or reduces horizontal visibility within 5m of ground level past the property boundary.
4. Dust	Any dust deposits should not raise the ambient dust deposit rate by more than 4 g/m ² per 30 days at any point past the property boundary.
5. Particulate matter	There should be no objectionable deposit of particulate matter on any land or structure beyond the property boundary.
6. Ambient Air Quality	<ul style="list-style-type: none"> a) Ambient air quality must stay inside Resource Management standards (National Environmental Standards for Air Quality) Regulations 2004². b) If no national environmental standards exist, ambient air quality should stay inside New Zealand Ambient Air Quality Guidelines MfE 2002². c) Where existing ambient air quality is better than concentrations in (a) and (b) above, there should be no significant degrading of ambient air quality.
7. Particulate matter - PM10	e) Ensure that the concentration of PM ₁₀ emissions in the Napier and Hastings Airsheds do not increase, and are reduced over time.
8. Decision making - Offsets	If your air discharge is a new activity, i.e. not an existing air discharge needing a replacement consent, located in any of the Airsheds in the region - contact HBRC's Consents Team to discuss the possible need for offsets as per this policy, and Policy 69a.

² Links to these documents are online at www.hbrc.govt.nz, keyword search: #RRMP

3. Assessment of Environmental Effects

Please try and add a sentence or two about each of these points

- The actual or potential effects of your proposed air discharge on the environment? You can comment on positive effects, as well as possible adverse/ negative effects.
Have a think about:
 - Will the discharge extend beyond the property boundary?
 - Will the discharge be noxious, dangerous, offensive and/or objectionable?
 - The surrounding environment.
What activities surround the site of your proposed discharge, i.e. residential or industrial? Is your proposed discharge in an Airshed or Airzone?
 - Are there people near the proposed discharge site? Will the discharge potentially impact on human health, amenity and social values of people nearby?
 - How will the discharge increase the particulate matter (PM₁₀) levels and impact on air quality in the area? How will your proposed air discharge add to the cumulative effects of air discharges already being caused in the area?
- Information about anything you intend to do to try and help reduce the effect your air discharge has on the environment.
- Details of any alternative methods of discharge and treatment or alternative sites you have thought about for the air discharge. Why do you consider that the proposed method of treatment and discharge is the best option?
- Details of any actions to off-set the effects of your proposed discharge.
- Details of anyone you have talked to about your proposed air discharge because you think the activity might affect them.

If you have any questions about what to provide, or want to arrange a meeting to discuss your application before you formally lodge it with HBRC
- contact the Consents Advisor on 06 833 8090.