

## Make Submission

<b>Consultee</b>	Mr Robert Devlin (58229)
<b>Email Address</b>	m.r.devlin@clear.net.nz
<b>Address</b>	21 Kenisngton Ave Rangiora Rangiora 7400
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-37
<b>Response Date</b>	11/03/15 11:58 AM
<b>Consultation Point</b>	13 MANDATORY INFORMATION ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Letter
<b>Version</b>	0.2
<b>To Be Heard</b>	
<b>Please select the appropriate option from the following:</b>	I DO NOT wish to be heard in support of my submission; or
<b>If so</b>	

## Make Submission

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<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-20
<b>Response Date</b>	6/03/15 10:47 AM
<b>Consultation Point</b>	Table 2.2 Space Heating Appliance Definitions ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Pellet Fires, whilst recommended as an alternative for wood burners, are treated in the same way as wood burners for consent purposes. The 15 year permitted life cycle appears too harsh, given that most users are encouraged to have annual inspections done, usually by accredited installers. It would seem to be wasteful of resources to throw out a Pellet Fire that is working well, has been serviced regularly and conforms to the emissions code.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Permit Pellet Fires that have been serviced regularly and certified as still in good operational order by an accredited technician beyond the 15 year consent period.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-21
<b>Response Date</b>	6/03/15 4:34 PM
<b>Consultation Point</b>	Schedule 5: Application of Ringlemann Scale ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Congratulations on including the Ringelmann Smoke Chart. (Schedule 5 p8.25-28) It is a fascinating way to observe and record air pollution. Please give serious consideration to adapting this for school use as a way to promote increased awareness of pollution issues. It could even become the basis of a competition, with appropriate awards to schools who keep the best detailed records.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Promotion in schools

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-22
<b>Response Date</b>	6/03/15 4:39 PM
<b>Consultation Point</b>	Schedule 9: Heritage Buildings ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Congratulations for including the list of Heritage Buildings in each Clean Air Zone. (p8.35-41) This reader can understand the connection between Heritage Buildings and the number of open fires, but the significance of this needs to be spelt out.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Are Heritage Building operators permitted to use their open fires?

### Air Shed

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-23
<b>Response Date</b>	6/03/15 4:46 PM
<b>Consultation Point</b>	7.68 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Support Oppose</b>	
Supports in Part or Opposes in Part	

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

The liquid/slurry effluent discharges onto land require records to be kept for three months only. (Section 7.68 – p7.22)

It has taken thirty years to realise the water degradation in Lake Taupo caused by cattle on the pumice lands to the west of that lake. Whilst the Canterbury Plains is not made up of pumice lands, it does have gravels which act in a similar way to pumice land. Surely these records should be archived for future reference to monitor the perceived downgrading of artesian waters across the entire Canterbury Plains area.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**



All liquid/slurry effluent discharges onto land be recorded and then archived for future refence.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-24
<b>Response Date</b>	6/03/15 4:59 PM
<b>Consultation Point</b>	9 Clean Air Zone Map Series ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Support Oppose</b>	
Supports in Part or Opposes in Part	

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** . Support

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

The concern over the inadequacies of the current ministerial approved air-sheds and the reality of urban expansion, especially post-earthquake, is somewhat modified by the enlarged proposed Clean Air Zones. e.g. Rangiora has had rapid expansion in virtually all directions, but what about the developments at Ravenswood, Pegasus Town, Selwyn and elsewhere?

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

That there be provision for including newly developing towns such as Pegasus in clean air zones.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-25
<b>Response Date</b>	6/03/15 5:13 PM
<b>Consultation Point</b>	1 Introduction ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

"Let's Clean the Air" fig 1.1 does not adequately address the issue of pollution caused by vehicles. The PM10 research quoted suggests that vehicles are responsible for 3% to 16% of the pollution. Could more research be done on the role of vehicle pollution in PM2.5 area? This writer is of the opinion that Regional Councils in New Zealand are too dependent on petrol tax income to be unbiased in their preparation of proposed air plans and indeed any policy documents relating to environmental issues.

The Proposed Air Plan does little to promote the use of electric vehicles as a means of over-coming vehicle caused pollution. The Air Plan developers are urged to give serious consideration to implementing vehicle bans and taxes similar to those proposed for Paris as outlined below:

Paris legislators are set to ban all trucks and buses registered before 30 September 2001 from the central city. They also plan to ban cars registered before 31 December 1996 and vans and light trucks registered before 1997. Rolling bans will see any car over nine years of age barred from the city centre

by 2020. Taxes will be raised on diesel fuels to discourage the public from buying them because of respiratory health concerns, and incentives will be offered for people to scrap their old diesel cars, replacing them with small petrol-powered or electric vehicles. NZ Autocar p14 March 2015.

Further to this is following:

Greens back call for air quality testing.

“Commissioner for the Environment Jan Wright says in a report released on Thursday that New Zealand's air quality is good by international standards but care must be taken to keep it that way.

She wants 10-year-old regulations to be reviewed and better measurement of tiny particles, called particulate matter that is breathed in”.

Christchurch, Nelson and Masterton sometimes spike above World Health Organisation guidelines, while Auckland has a problem with increasing diesel emissions. 6 March 2015.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Please change the statement "These means are best addressed in policy and regulation outside of this document" to a statement which acknowledges the power of this regional council to make positive changes on national policy.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	Mr Robert Devlin
<b>Submission ID</b>	pCARP-27
<b>Response Date</b>	8/03/15 10:16 AM
<b>Consultation Point</b>	Table 2.1 General Definitions ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

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**My submission is that:**  Support

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Please include a definition of intensive dairy farming

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Please include a definition of intensive dairy farming

### Air Shed

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**