

From: [Phil Tindall](#)
To: [Mailroom Mailbox](#)
Subject: Air Plan Submission
Date: Tuesday, 24 March 2015 11:13:59 p.m.
Attachments: [PTindall air-plan-submission.pdf](#)

Please find attached my submission on the Air Regional Plan.

Regards

Phil Tindall
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FOR OFFICE USE ONLY

Submitter ID:

File No:

Submission on the Proposed Canterbury Air Regional Plan

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm, Friday 1 May 2015 to:

Freepost 1201
Proposed Canterbury Air Regional Plan.
Environment Canterbury
P O Box 345
Christchurch 8140

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Organisation*: _____ Phone (Wk): 03 3515851

* the organisation that this submission is made on behalf of

Postal Address: 304 Ilam Road Phone (Cell): 027 4352093

Burnside, Christchurch Postcode: 8053

Email: phil@lucid-design.co.nz Fax: _____

Contact name and postal address for service of person making submission (if different from above):

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- I could not gain an advantage in trade competition through this submission; or
- I could gain an advantage in trade competition through this submission. **If you have ticked this box please select one of the following:**
- I am directly affected by an effect of the subject matter of the submission
 - I am not directly affected by an effect of the subject matter of the submission

Signature:  Date: 24/03/15

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

B



I do not wish to be heard in support of my submission; or



I do wish to be heard in support of my submission; and if so,



I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

<p>C (1) The specific provisions of the proposal that my submission relates to are: <i>(Specify page number and subsection numbering for each separate provision).</i></p>	<p>(2) My submission is that: <i>(State concisely whether you support or oppose each separate provision being submitted on, or wish to have amendments made and the reasons for your views.)</i></p>	<p>(3) I seek the following decisions from Environment Canterbury: <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i></p>
<p>Page 24, Sections 7.76:Space Heating</p>	<p>I write in general support of the provision that allows continued use of enclosed burners. My objection is to the enforcement of the stringent conditions around older log burners and the steep timing of their phasing out..</p>	
<p>7.76 On all sites within a Clean Air Zone and on all sites less than 2ha outside Clean Air Zones: 1. The discharge of contaminants into air from any enclosed burner installed after 28 February 2015 that is not a low emitting enclosed burner or ultra-low emitting enclosed burner and has not been installed in accordance with Part 1 of Schedule 7; or 2. The discharge of contaminants into air from space heating appliances burning fuel with a sulphur content exceeding 1% by weight or a moisture content greater than 25%; or 3. The visible discharge of contaminants into air from space heating appliances for a period exceeding 15 minutes following start up and 5 minutes following refuelling is a prohibited activity.</p>	<p>Affordability: I oppose the strict enforcement of the rule that permits only ultra-low emitting burners as this will disadvantage those without the resources to upgrade. These users must be allowed to transition at the pace that they can afford. Or offered assistance to comply. Any enforcement that forces these users into unaffordable power bills, or to live in cold houses is fundamentally unjust. Since 2000, electricity prices have risen by <i>46 percent</i> in real terms (Consumer) and most users have not had a corresponding rise in income. Firewood remains the most affordable source of heat energy and the only one that consumers can gather or grow without recourse to financial resources. To use emission levels as a barrier to vulnerable families staying warm is unacceptable. Public Health: Furthermore the public health consequences of any such draconian enforcement will be much worse than those caused by particulate emissions. And there are moral implications to any action likely to result in a family living in a cold house or in debt to their power company. It is akin to a power company turning off the power to a family with someone on a respirator. The public will take a dim view if heavy handed enforcement contributes to such outcomes.</p>	<p>Enforce the provisions of the plan softly, with flexibility and some humanity. Assist those that are struggling to comply and under no circumstances leave them at the mercy of their power company or in the cold. Allow plenty of time for adjustment. Use incentives and yes, subsidise if necessary. It is incumbent on those wanting cleaner air to contribute to the cost of achieving it. Just making rules that are costly to comply with is not good enough and will not achieve public buy-in.</p>

Add further pages as required.

<p>C (1) The specific provisions of the proposal that my submission relates to are: <i>(Specify page number and subsection numbering for each separate provision).</i></p>	<p>(2) My submission is that: <i>(State concisely whether you support or oppose each separate provision being submitted on, or wish to have amendments made and the reasons for your views.)</i></p>	<p>(3) I seek the following decisions from Environment Canterbury: <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i></p>
<p>Page 24, Section 7.76:Space Heating</p>	<p>Resilience: As previously mentioned, burning firewood is the most affordable and accessible way of keeping families warm. It is renewable and also the most resilient. After the Christchurch earthquakes many families depended on their, sometimes old, log burners to warm their houses and even to cook with when the power was out. Many only use their log burners rarely, and only when it is particularly cold. Heat pumps don't work well once the temperature drops below a certain level and not at all when the grid goes offline. And yet the clean air regulations have ensured that most new houses have only vulnerable electrical heating available. All other forms of heating are expensive and are unobtainable without cash. During an emergency or a disaster those households with log burners will be most likely to be warm, or to be able to cook. Recent experience tells us that you cannot discount the likelihood of such events. Disasters need not be natural. Recently we experienced near financial collapse with the GFC. The world economy still looks wobbly despite a drop in oil prices due to low demand. Nobody can be sure this won't happen again, perhaps worse, and meanwhile our power suppliers are being privatised and are ramping up their charges for maximised profit. It is not hard to imagine suburbs of redundant middle managers freezing through a Christchurch winter because they find themselves unable to afford the power bill, let alone the mortgage. In such a scenario cars would be used less so there would be some gain in air quality to balance. The odd log burner would go a long way to providing some resilience in such a situation.</p>	<p>Recognise and acknowledge that solid fuel space heating is a vital component of a balanced and resilient energy suite. Losing them would be a source of regret. Clean air is a worthy goal but it is just one outcome and must be balanced with other desirable outcomes. Outcomes like the ability of a family to stay warm, without the onerous financial burden imposed by council enforcement, delivering them into dependency on power companies motivated only by profit. The plan must include a section on social responsibility and the competing outcomes that must be balanced against the pursuit of cleaner air.</p>

Add further pages as required.