

**From:** [Gerrit Venema](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission on the Proposed Canterbury Air Regional Plan  
**Date:** Wednesday, 15 April 2015 4:44:46 p.m.

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Submission on the Proposed Canterbury Air Regional Plan  
Submitted via email on 15 April 2015

**A**

Name: Gerrit Venema  
Organisation: N/a as I am a Home owner/rate payer not a business  
Postal Address: 37 Fairford st Bishopdale 8053 Christchurch  
Email: [GerrytVenema@gmail.com](mailto:GerrytVenema@gmail.com)  
Phone: 03 3598007

Trade competition Q: I could not gain an advantage in trade competition through this submission.

**B**

I do wish to be heard in support of my submission and would consider presenting in a joint case with others make similar submissions.

Ecan Clean air Plan:

General comments that oppose the proposed plan (within the Christchurch (CHC) clean air zone):

1. Ecan 'goal posts' keep changing: Since 2001 the proposals and implementations by Ecan have been unnecessarily changeable, building up public distrust and in turn largely undermining Ecan's credibility. It appears from this current proposal that Ecan has no tolerance for people of low financial means surviving in their own homes in CHC. I believe from studies that I've read overseas that this type of demography targeting (intolerance to the needs of the poor) is to a city's detriment. To be forced into replacing a perfectly good woodburner every (I've just had a number of quotes back the cheapest is just over \$4000!) or into unavoidably alternative heating expenses and now to be faced with yet further expense/worries of still relatively unknown expectations would honestly come under the umbrella of "Bullying". Did you ever see anyone giving away free electricity, fossil fuel, pellets or gas? How do you expect me to survive the cost of winter and power cuts? Or to mention a serious earthquake in the middle of winter?
2. The use of fire wood is an essential CHC asset: a pioneering NZ legacy, easily obtained, and an environmentally sustainable source of energy for home heating, water heating and cooking. Let's face it, CHC in world comparison is not a very big city but is bursting with trees. Just a step out of the city and there are forests of wood! As a community services card holder, self employed (and NOT currently on any government benefits) I protest at being 'bullied' into having to break into my retirement funds at age 50 to replace my woodburner at such short notice. Especially when I'll be forced into it again in just 15yrs times! With what appears to be warming up to be a huge expense.

3. Speaking of cooking? No mention about indoor cooking that I could see in the plan. I use my woodburner for cooking all the time. I protest at not being allowed to use my cooking facilities. I'm sure it wouldn't take much scientific 'reporting' to prove not being able to cook to eat is bad for my health!

General submissions/suggestions of things Ecan should be doing better to effect the intent of clean air (within the Christchurch (CHC) clean air zone):

1. **Motor vehicle emissions and other forms of combustion (not targeted in this plan):**

The occurrence of these in the City of CHC should be included in Ecan's proposal to reduce pollution levels. I don't believe the current percentages given represent a true and accurate picture of pollutant distribution and their sources in CHC 2015 and going forward. I don't seem to find any maps of the pollution distributions by suburb nor a report on the detailed testing procedure. We only seem to have generic graphs for each city. I propose further and more transparent zone testing is required, not just city centre or just taking the worst reading obtained for the day. We need to know what pollutant levels are in each of the suburbs in CHC throughout the winter. I am not convinced that there is a CHC clean air zone wide problem. I don't favour a 'blanket' cover so nobody's nose gets out of joint or just to exclude 'finger pointing'...because that's actually what this proposed plan does: picking on **every** woodburner operator by exclusion in mass.

2. Health issues misleading: I have been convinced by some very high standing academics' of this city (U of C) that the accuracy and interpretation of health issue data used by Ecan is quite misleading. In the light of the known health issues from being too cold I believe this needs revisiting and needs to be proven, transparent and balanced with the likely negative outcomes of plan proposed action.

These specific submissions concern only those parts of the plan that effecting space heating within the Christchurch (CHC) clean air zone and oppose the current writing of the plan.

8. Schedules

Page 8-6 & 8-7 Schedule 2: Assessment of offensive and objectionable effects:

Enforcement of smoke free chimneys: I neither saw nor heard of any enforcement action taken in my area of CHC (Bishopdale) ever in the 23yrs I've been here, and yet there were a handful of homes often continuously pouring visible smoke into the air most evenings last winter. No need to elaborate on all the previous years as they had more smoke than last year! Due to the relatively small number of fires compared with many years ago, they were also decidedly obvious. Therefore I would largely question the intent and direction of this proposed air plan as it seems to have completely missed the point of achieving smoke free results as there seems to be **simply** no enforcement of the existing rules. Yes I do believe in picking on woodburner operators for non-compliance

but in areas where the rubber meets the road...smoke! The current proposal seems to include a section on 'assessment' in Schedule 2 covering smoke particles in what seems time consuming, tiring and numbingly ineffective for the sufferer. The criteria seem simple enough: 15 minutes start up 5 minute reloads. But why should it be the rate payer's responsibility to have to go around doing all the complaining and work? Imagine if the Police enforcement non-compliance with road safety rules and policy was that way!!!

In saying that – this therefore makes Ecan's policy out of step with the Land transport policy on compliance management – room for raising the bar here. We need Ecan out there on the ground doing something about it. It's obvious just drive around in a winter evening. Why do you need me to tell you if its 15 minutes and smoking.

Pointless developing more rules if nobody historically has any real reason to listen. And for the record, I object to wasting my rates money on expensive gadgets to detect heat coming out of chimneys...smoke's the issue not heat.

The detail of the proposed plan:

Additional words to item 3.

Para 7.87 item 3. The discharge is not from a low emitting enclosed burner of a model no longer listed as an approved burner after:"

a. 15 years from...(as written)

Para 7.87 item 4. "If installed after 28 February 2015..."

Needs to be altered to

Para 7.87 item 4. "If installed after the date that the Canterbury air regional plan becomes active, the low emitting..."

\***Compliance requirements** that back-date to a time before the proposed compliance was even able to be viewed is simply **unworkable**.

New additional item 5.

Para 7.87 item 5. "The discharge is not from a low emitting enclosed burner that fails a condition fitness inspection.

Foot note: Condition fitness inspection can be request by Ecan at anytime where monitoring or complaints have recorded visible elements being discharged outside the allowable criteria."

Addition to Schedule 2: Assessment of offensive and objectionable affects

Para xxxx:

CRC will physically monitor space heating discharge to atmosphere for visible elements and take enforcement action in the CHC clean air zone as required to eliminate chimneys smoking outside of allowable limits.

Yours sincerely  
Gerrit Venema