

From: [Gillian marks](#)
To: [Mailroom Mailbox](#)
Subject: Submission on Proposed Canterbury Air Regional Plan by Gillian Ensor
Date: Monday, 27 April 2015 8:14:38 p.m.
Attachments: [GEnsor Air Regional Form 27042015 final.pdf](#)
[GEnsor Air Plan Submission 27042015 final.pdf](#)

Sent from Windows Mail

Hi,

Please find attached my submission on the Proposed Canterbury Air Regional Plan. There are two attachments, the first is the submission form, and the second is my submission.

Regards,
Gillian Ensor

Submission on the Proposed Canterbury Air Regional Plan

FOR OFFICE USE ONLY

Submitter ID:

File No:

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

A

Full Name: Gillian Ensor

Phone (Hm): 03 9422841

Organisation*: _____

Phone (Wk): _____

* the organisation that this submission is made on behalf of

Postal Address: 57 Bletsoe Avenue, Spreydon,
Christchurch, 8024

Phone (Cell): 021 1228372

Postcode: 8024

Email: marksgillian@hotmail.com

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: Gillian Ensor

Date: 27/04/2015

(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

Submission by Gillian Ensor on the Proposed Canterbury Regional Air Plan

Background

1. I live within the Christchurch Clean Air Zone.
2. I have lived in my 1920's weatherboard house since 2006. It is 107 square metres in area and has a 3 metre high ceiling. There is insulation in the ceiling. All internal walls have been relined with gib-board and are all insulated. There is not enough room in the sub-floor to install underfloor insulation. The living area faces a northerly direction and receives a large amount of sun.
3. In 2007, I replaced the open fire with an (at the time) ECan approved solid fuel burner. The building permit for this was issued on 17 January 2007. The burner has a wetback which contributes to heating my hot water which reduces my power bill. The burner heats my entire house as I have installed a very effective heat transfer system which transfers the heat from my living room into the bedrooms.

Relevance of the Proposed Canterbury Regional Air Plan (Proposed Plan)

4. I live within the Christchurch Clean Air Zone, and use what is now defined as a low emitting enclosed burner to heat my home. I will be directly affected by the Space Heating objectives, policies and rules in the Proposed Plan which place restrictions on the discharge of contaminants into air from a low emitting enclosed burner.
5. I wish to ensure that the regulatory regime under the Proposed Plan does not curtail my existing lawfully established activity, which is to discharge contaminants into air from a low emitting enclosed burner as a permitted activity.

Existing Regulatory Framework

6. Under the existing Canterbury Natural Resources Regional Plan, Chapter 3, Air Quality, the discharge of contaminants into air from the burning of solid fuel in any enclosed burner is a permitted activity.

Proposed Plan Regulatory Framework

7. Under the Proposed Plan, the discharge of contaminants into air from a low emitting enclosed burner is authorised by Rule 7.87. This rule allows me to discharge contaminants into air from a low emitting enclosed burner as a permitted activity. As the rule is drafted, because my low emitting enclosed burner was installed prior to 1 January 2019, I can continue to discharge contaminants into air as a permitted activity for 15 years from the date of installation. This will mean that after 17 January 2022, I will not be able to discharge contaminants into air from my low emitting enclosed burner as a permitted activity, and if I do continue to do so, this will be a prohibited activity under Rule 7.84.

Specific Submissions

8. My specific submissions are contained in Appendix A.

Relief Sought

9. That Rule 7.87 is amended as outlined in Appendix A to ensure that my existing lawfully established activity remains as a permitted activity.
10. The policies, methods and any explanatory texts be amended, where appropriate, to give effect to the decision sought in this submission or such other words to address the concerns raised; and
11. Any consequential changes necessary to the policies, methods and any other explanatory text necessary to give full effect to the decision sought.

Gillian Ensor

Dated 27 April 2015

Appendix A: Submissions

Sub #	The provisions of the Proposed Plan that my submission relates to are:	My submission is that:		I seek the following decisions from Environment Canterbury:
		Oppose/ Support	Reasons	
1	Rule 7.87	Oppose	Rule 7.87 unnecessarily restricts me from continuing to use a cost effective, efficient, existing, lawfully operable low emitting enclosed burner to heat my home.	<p>Delete Rule 7.87 and replace with the following:</p> <p>Within the Christchurch Clean Air Zone the discharge of contaminants into air from a low emitting enclosed burner is a permitted activity provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. The low emitting enclosed burner is located on a site that is 2ha or greater in area; or 2. The low emitting enclosed burner is not installed after 1 January 2019; and 3. The discharge is not from a low emitting enclosed burner after: <ol style="list-style-type: none"> a. 15 years from the date of installation of that burner; or b. 1 January 2019 <p style="text-align: center;">whichever is the later; and</p> 4. If installed after 28 February 2015 but before 1 January 2019, the low emitting enclosed burner is located in: <ol style="list-style-type: none"> a. A dwelling, including an extension or alteration to that dwelling, for which building consent was issued prior to 1 January 2003; and b. An existing dwelling to replace an open fire, older style or low emitting enclosed burner that was lawfully operable within the entire 12 months immediately prior to the installation of the low emitting enclosed burner; or <p><u>Within the Christchurch Clean Air Zone the discharge of contaminants into air from a low emitting enclosed burner is a permitted activity provided the following conditions are met:</u></p> <ol style="list-style-type: none"> 1. <u>The low emitting enclosed burner is located on a site that is 2ha or greater in area; or</u> 2. <u>The low emitting enclosed burner is located in a dwelling, including an extension or alteration to that dwelling, for which building consent was issued prior to 1 January 2003; and</u> <ol style="list-style-type: none"> i. <u>Replaces an open fire or older style enclosed burner that was lawfully operable within the entire 12 months immediately prior to the installation of the low emitting enclosed burner and is installed before 1 January 2019; or</u> ii. <u>Replaces a low emitting enclosed burner that was lawfully operable within the entire 12 months immediately prior to the installation of the low emitting enclosed burner.</u> <p>Or other amendments to achieve permitted activity status for low emitting enclosed burners in the Christchurch Clean Air Zone.</p>

