

Make Submission

Consultee	Mr Stephen Walders (61794)
Email Address	walders@slingshot.co.nz
Address	35 Winchester Street Lyttelton 8082
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Mr Stephen Walders
Submission ID	pCARP-294
Response Date	23/04/15 11:00 PM
Consultation Point	13 MANDATORY INFORMATION (View)
Status	Submitted
Submission Type	Web
Version	0.2
To Be Heard	
Please select the appropriate option from the following:	I DO NOT wish to be heard in support of my submission; or
If so	

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Email Address	walders@slingshot.co.nz
Address	35 Winchester Street Lyttelton 8082
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Mr Stephen Walders
Submission ID	pCARP-244
Response Date	23/04/15 11:00 PM
Consultation Point	Schedule 7: Installation, registration and maintenance of domestic solid fuel burners (View)
Status	Submitted
Submission Type	Web
Version	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:

I wish to oppose Part 1 (Installation) of Schedule 7 (Installation, registration and maintenance of domestic solid fuel burners).

1) Though the discharge of combustion from a solid fuel burner is under the control of Environment Canterbury via the Resource Management Act. The installation of the appliance is classed as building work and hence falls under the Building Act 2004. Thus a building consent is required for the installation (building work) of a new or change to an existing solid fuel heater installation. The purpose of the Building Act was to ensure uniformity and consistence of building work thought New Zealand. Both the Building Act 2004 and Plumbers, Gasfitter and Drainlayers Act 2006 deal with persons who are licenced to perform building work. By invoking part 1 of Schedule 7 Environment Canterbury is regulating an industry to perform building work which is already suitability controlled and regulated.

Schedule 7 part 1 flies against the face of the entire purpose of the Building Act. I believe is out of Environment Canterbury's remit to regulate who can or cannot install solid fuel heating appliances. Builders and home owners can install solid fuel heaters under New Zealand law. Part 1 of Schedule 7 does not take in consideration of those persons or any other who are qualified and/or experienced to perform that work who are not members of the Home Heating Association nor the owner/builder provisions of the Building Act. Certifying and licence plumbers are the only persons who are licenced and qualified to do the complete installation of solid fuel burners particularly when there is a wet back associated with the installation. Part 1 of Schedule 7 does not permit these suitability qualified and licenced persons from performing building work.

2) My professional role over the last ten years working on the behalf of two Territorial and Building Consent Authority's has involved me inspecting the installation of solid fuel heaters. Some of these installations have been completed by members of the Home Heating Association. From my experience there have been cases where solid fuel heating appliances installed by members of the Home Heating Association have completed the installation incorrectly and/or non-compliantly. Therefore I do not believe that members of the Home Heating Association perform the task of installation of a solid fuel heating appliance any better or worse than any other group or individual of the community. It is my belief that no matter which group or group of individuals who install solid fuel heating appliances their actions will not change (or have an adverse effect of) the discharge to the environment from a correctly installed and compliant solid fuel heating appliance.

3) Part 1 of Schedule 7 will prevent and dis advantage those who perform the task of installing solid fuel heaters (including those who work inside and out of the Environment Canterbury area) who are not members of the Home Heating Association from working in the Canterbury Region.

4) There is no advantage to having members of the Home Heating Association strictly performing the installation of solid fuel heater installations. Particularly when those members who are not (or do not have on staff) certifying plumbers to complete the installation of wet backs.

5) It appears or can be perceived that Environment Canterbury has come is a suitable arrangement which financially benefits a single group of the community and excludes others including the rate payer.

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:

I seek that Environment Canterbury removes part 1 of Schedule 7 in its entirety from the Proposed Canterbury Air Regional Plan.

Air Shed

Which Air Shed does this submission relate to or none

Choose one of the following three

Tick relevant topics