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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

A
Full Name: THOMAS PATTINSON PALMER Phone (Hm): 03 349 5509
Organisation*: _____ Phone (Wk): _____
* the organisation that this submission is made on behalf of
Postal Address: 101 Hamptons Rd. Phone (Cell): _____
R.D.6 CHRISTCHURCH Postcode: 7676
Email: pat.palmer@clear.net.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: T. P. Palmer Date: 27. 4. 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

My submission on the proposed ECan Air Plan

C 1 All the provisions restricting the use of wood burning for home heating.

2 I oppose all such provisions.

3 All such provisions should be cancelled.

My reasons for such a drastic revision of the air plan are set out below.

1 Those parts of the Air Plan prohibiting or restricting the burning of wood to heat homes are based on the assumption/belief that fine particles, PM10 or PM2.5, emitted from home fires are harmful to health, and result in sickness and premature death of large numbers of people in New Zealand each year. In , Christchurch in particular, smoke from home fires is claimed to cause upwards of 150 premature deaths each year. It is claimed that reducing the emissions of particles from home fires so that concentrations of fine particles in the air meets the National Standard, would reduce the large number of premature deaths, hospital admissions for respiratory complaints, and thousands? of days of sickness.

2 Before prioritising meeting the National PM10 standard as its Air Plan objective, ECan should be asking whether the progress which has been made towards reaching this standard has resulted in the estimated improvements in health, and whether the further restrictions necessary to reach it are likely to do so.

3 The Parliamentary Commissioner for the Environment recently reviewed the latest reports from the Ministry for the Environment, and found no evidence of the claimed higher death rates from respiratory disease in areas with higher concentrations of PM10, and no evidence of the claimed reductions in death rates resulting from recent reductions in concentrations of PM10.

4 Given this, and much other local evidence from many years, it is clear that rules designed to reduce concentrations of PM10 by restricting the use of

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wood for home heating will not result in the hoped for, and claimed, improvements in public health.

5 The present rules restricting the use of wood for home heating have denied people access to the most reliable and economical form of home heating. So far this has cost Canterbury ratepayers and householders some hundreds of millions of dollars in higher energy bills , and in replacing perfectly serviceable but out-lawed appliances. This ECan induced energy-poverty may well have led to a worsening of public health, not an improvement.

6 As a first step in improving the Air Plan, ECan should demand of the Ministry that the evidence on which the air Quality Standard and the Plan is based be reviewed by experts independent of the architects of the Plan. This panel should ask whether meeting the standard by reducing emissions from wood fires is at all likely to improve the health of Canterbury people. And it should ask whether the concentration of fine particles in New Zealand air, and Canterbury air in particular, is useful as an index of its healthiness.

Pat Palmer 27 4 15

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