



Submission on the Proposed Canterbury Air Regional Plan

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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:

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

A

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* the organisation that this submission is made on behalf of

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

N/A

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: [Signature]

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.

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- ☒ 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 on the Proposed Canterbury Air Regional Plan

Our property is greater than 2ha located currently in Ashburton Clean Air Zone 2. There is approximately 900metres of hedge/trees that are machine trimmed each year or every 2nd year, this also includes the topping of the my boundary hedges for the neighbouring properties. I need the plan to accommodate the problem of the disposal of the hedge trimmings which are piled up and burnt approximately 4 weeks after trimming, burning time takes 4 to 5 hours. If the current burning practice is to be discontinued, then the plan needs to have an extended period to allow burning to continue for at least 15years to allow for larger site owners the time to remove all larger hedge/tree vegetation that require regular trimming.

The clean air plan also needs to consider that on these larger sites of greater than 2 ha, the density of dwellings is lesser, the need to give consideration of age of these dwellings and their heating requirements, most will have older wood burners and most properties will have an abundance of wood on site. Many of the owners of these properties will use tree wastes from fallen trees for wood fuel after drying and operate their wood burners in a responsible manner.

The clear solution to this problem would be to apply the Ashburton Rural Zone rules to all sites greater than 2 ha lying in the old Clean Air Zone 2, which is proposed to be incorporated into the new Ashburton Clean Air Zone.


Ken Saunders

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REFER RULES (SEE NOTES)

7.10 - IN RURAL AREAS,
ASHBURTON CLEAN AIR ZONE
SITES GREATER THAN 2HA.

7.78 — WHICH REFER TO 7.76
REQUIRES A CLAUSE
FOR REPLACEMENT RURAL TYPE
WOOD BURNERS FOR SITES > 2HA

7.85-1 OLDER WOOD BURNERS ARE PERMITTED
ACTIVITY FOR HOW LONG? AT LEAST NOT LESS THAN
15 YEARS FROM NEXT RULE CHANGE?? - 2HA OR GREATER

1. The management of the effects of the dispersal or deposition of particles beyond the boundary of the property of origin; and
2. The contents and application of a smoke management plan; and
3. The management of cumulative effects on the township adjacent to the buffer area; and
4. The actual and potential effects of the discharge on surrounding neighbours; and
5. The matters set out in rule 7.2.

7.10 In rural areas, the discharge of contaminants into air from outdoor burning of vegetation, paper, cardboard and untreated wood is a permitted activity provided the following conditions are met:

- ✓ 1. The material to be burnt is not standing crop residue subject to rule 7.9 above; and
2. The material to be burnt is located at least ^{50m} 100m upwind or 50m in any direction of any sensitive activity that is not located on the property where burning occurs; and
- ✓ 3. The material to be burnt has been left to dry for at least 6 weeks prior to burning or is located at least 200m in any direction of any sensitive activity that is not located on the property where burning occurs; and
4. If within 5km of any urban area, burning only occurs when a windspeed of between 1 and 15km per hour has been forecast by a reputable weather service.
5. Burning is only of material sourced from no more than 2 adjoining properties where that material has been derived or used, and burning is undertaken on one of those properties; and
- ✓ 6. If the discharge is likely to continue for ^{1 DAY} 3 days or more, a smoke management plan has been prepared in accordance with Schedule 3 and the discharge is managed in accordance with that smoke management plan; and
7. Any smoke management plan required under condition 6 above is supplied to the CRC on request; and
8. Within a Clean Air Zone, burning does not take place during May, June, July or August; and
- ✓ 9. The discharge does not cause an objectionable or offensive effect beyond the boundary the property of origin, when assessed in accordance with Schedule 2.

7.11 In rural areas, the discharge of contaminants into air from outdoor burning of animal carcasses and offal is a permitted activity provided the following conditions are met:

1. The burning is undertaken for biosecurity reasons in accordance with rule 7.7; or
2. The discharge does not occur within 100m of a property boundary; and
3. The discharge does not cause an offensive or objectionable effect beyond the boundary of the property of origin when assessed in accordance with Schedule 2.

Space heating

Space heating Region Wide

7.75 On all sites outside Clean Air Zones, the discharge of contaminants into air from space heating appliances, including appliances fitted with domestic emission reduction secondary technology, is a permitted activity unless the discharge is prohibited by rule 7.76.

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.

Space heating within all Clean Air Zones

REPLACEMENT

REQUIRES CLAUSE FOR RURAL TYPE WOOD BURNERS ON SITES GREATER THAN 2HA.

7.77 Within a Clean Air Zone, unless the discharge is prohibited by rule 7.76, the discharge of contaminants into air from any ultra-low emitting enclosed burner or domestic liquid or gas fuel burning device is a permitted activity.

* 7.78 Within a Clean Air Zone on sites 2ha or greater in area, unless the discharge is prohibited by rule 7.76, the discharge of contaminants into air from any older style or low emitting enclosed burner is a permitted activity.

7.79 Within a Clean Air Zone on sites 2ha or greater in area, unless the discharge is prohibited by rule 7.76, the discharge of contaminants into air from an open fire installed prior to 1 January 2013 is a permitted activity.

7.80 Within a Clean Air Zone on sites 2ha or greater in area, unless the discharge is prohibited by rule 7.76, the discharge of contaminants into air from any domestic emission reduction secondary technology is a permitted activity.

7.81 Within a Clean Air Zone, the discharge of contaminants into air from any space heating appliance within a heritage building is a permitted activity provided the following conditions are met:

1. The space heating appliance is located within a heritage building that is listed in Schedule 9 or a heritage building that is listed as a Category 1 heritage building by Heritage New Zealand Pouhere Taonga; and
2. The space heating appliance and chimney were original features of the building (including restored original features).

7.82 Within a Clean Air Zone on sites less than 2ha in area, the discharge of contaminants into air from domestic solid fuel burning devices fitted with domestic emission reducing secondary technology is a discretionary activity.

7.83 Within a Clean Air Zone on sites less than 2ha in area, the discharge of contaminants into air from any space heating appliance that is not installed, registered and maintained in accordance with Parts 1 and 2 of Schedule 7 is a prohibited activity.

Does rule 7.85 with reference to 7.85-1 indicate that old wood burners are a permitted activity for how long, ??? 15 years after the next rule change??

Proposed Canterbury Air Regional Plan

7.84 Within a Clean Air Zone, unless permitted or otherwise classified by rules 7.76 to 7.93, the discharge of contaminants into air from space heating appliances is a prohibited activity.

Within the Rangiora, Kaiapoi or Ashburton Clean Air Zones:

7.85 Within the Rangiora, Kaiapoi or Ashburton Clean Air Zones, the discharge of contaminants into air from an older-style enclosed burner is a permitted activity provided the following conditions are met:

1. The older-style enclosed burner is located on a site that is 2ha or greater in area; or
2. The discharge does not occur after 15 years from the date of installation of that burner.

7.86 Within the Rangiora, Kaiapoi or Ashburton Clean Air Zones the discharge of contaminants into air from a low emitting enclosed burner is a permitted activity provided the following conditions are met:

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:
 - (a) 15 years from the date of installation of that burner; or
 - (b) 1 January 2019

whichever is later; and

4. If installed after 28 February 2015 but before 1 January 2019, the low emitting enclosed burner is located in:
 - (a) A dwelling, including an extension or alteration to that dwelling, for which building consent was issued prior to 31 December 2009 in Rangiora or Kaiapoi, or 31 December 2015 in Ashburton; 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.

Within the Christchurch Clean Air Zone:

7.87 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:

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:
 - (a) 15 years from the date of installation of that burner; or
 - (b) 1 January 2019

whichever is later; and

4. If installed after 28 February 2015 but before 1 January 2019, the low emitting enclosed burner is located in: