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

Full Name: HENRY PATTE (PAT) BARCHAM
Organisation: 
Postal Address: 3/22 Lyttelton St
Christchurch
Email: 

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: BARCHAM
Date: 28/4/2015

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

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.
(1) The specific provisions of the proposal that my submission relates to are: (Specify page number and subsection numbering for each separate provision).  

| Clause 7-37 pages 7-35 and 7-16, sections 3(a) | Home owners have replaced open fires and old designer woodburners with low emission approved woodburners. For all previously ECAN Christchurch Clean Air Zone woodburners change to 25 years or in good faith they can continue using their appliance for its safe working life. Stipulating 15 years as the legal allowable working life for an approved low emission woodburner goes against intrinsic justice. This requirement is unfair, it's a 'one rule fits all situation.' Woodburners vary in quality of manufacture and amount/method of usage, some may need replacing after 15 years whereas others are still in good condition and do not need replace costly premature replacement. |

(2) My submission is that: (State concisely whether you support or oppose each separate provision being submitted on, or wish to have amendments made and the reasons for your views.)  

(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)  

Air Shed General Map Series The air shed concept adopted Amend clause 7-87-1 Vol4, Map 157 Clause 7-87-1 an arbitrary approach to the to allow the continued
Section C

Air pollution issue. It treats a woodburner situated 200m a.s.l. on the Port Hills (above the inversion layer) to be as polluting to the city as a similar burner located in St Albans or elsewhere on the flat. To further emphasise this situation there is a narrow section of air shed following the west side of Dyers Pass Road (above the Sign of the Taniwha) that is bounded on one side by rural land and the other by park/land. Downhill drift (if any) would be into rural/forestry land.

Having warm dry homes in winter is essential for good health. The NAQS requirement for 3 or less high pollution days by 2016 for all New Zealand is too restrictive and too soon for colder regions. Healthwise this is counterproductive. For some, electricity and gas is expensive compared to firewood. Authorities must recognise electricity and gas production and supply systems are vulnerable to adverse conditions. Home heating using a renewable fuel (firewood) must be readily available. According to a 19/3/2013 article in The Press the NAQS rules are out of date (ref Dr J. Wright's report).

Use of previously ECAN approved low emission woodburners on hillside properties that are in a situation above the winter night/early morning inversion layer (somewhere between 50m and 100m a.s.l.).

Request Government to update and relax the NAQS rules concerning air pollution from domestic heating.

National Air Quality Standard (NAQS) Rules.