

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:

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

A

Full Name: HENRY PATTLE (PAT) BARHAM

Phone (Hm): (03) 3385718

Organisation*: _____

Phone (Wk): _____

* the organisation that this submission is made on behalf of

Postal Address: 8/212 Lyttelton ST
Christchurch

Phone (Cell): _____

Postcode: 8024

Email: _____

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: J.P. Barham

Date: 28/4/2015

(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

C (1) The specific provisions of the proposal that my submission relates to are: (Specify page number and subsection numbering for each separate provision).	(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.)
<p>Clause 7-87 pages 7-25 and 7-26, sections 3(a) and 3(b) - Christchurch Clean Air Zone.</p>	<p>(Amendments Requested)</p> <p>Home owners have replaced open fires and old design wood-burners with low emission ECAN approved woodburners 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 natural 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/require costly premature replacement.</p>	<p>For all previously ECAN approved low emission woodburners change the allowable operating life to 25 years or when the woodburner condition necessitates replacement, whichever comes first.</p>
<p>Air Sheds General Map Series Vol 9, Map 15 & Clause 7-87-1.</p>	<p>The air shed concept adopts an arbitrary approach to the</p>	<p>Amend clause 7-87-1 to allow the continued</p>

Add further pages as required.

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 Takahe) that is bounded on one side by rural land and the other by parkland. Downhill drift (if any) would be into rural/forestry land.

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

National Air Quality Standard (NAQS) Rules.

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 counter productive. 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 14/3/2015 article in The Press the NAQS rules are out of date (ref. Dr J. Wright's report).

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