

Make Submission

Consultee	Michael de Hamel (58211)
Email Address	michael@akaroamail.co.nz
Address	PO Box 84 Kaiapoi 7644
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Michael de Hamel
Submission ID	pCARP-35
Response Date	11/03/15 11:28 AM
Consultation Point	13 MANDATORY INFORMATION (View)
Status	Submitted
Submission Type	Letter
Version	0.2
To Be Heard	

Please select the appropriate option from the following: I DO wish to be heard in support of my submission;

If so

Make Submission

Consultee	Michael de Hamel (58211)
Email Address	michael@akaroamail.co.nz
Address	PO Box 84 Kaiapoi 7644
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Michael de Hamel
Submission ID	pCARP-15
Response Date	4/03/15 3:19 PM
Consultation Point	Proposed Canterbury Air Regional Plan (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:

Two important sections have been omitted.

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:

Air Plan submission

1)The previous plan included an exception which allowed the use of open fires in historic-listed buildings. This plan does not.

Yes, by invoking the clauses at the bottom of Page 3.2 the use of such fireplaces could be argued to be an existing use, there are potential complexities if for example brickwork were to be replaced – which might trigger a local authority consent process.

While there are probably very few listed buildings with extant fireplaces and chimneys, to maintain the historical integrity of form and function their use should continue to be permitted, with care and attention to fuel quality, in all areas.

Given the very small number of properties involved, and that many will be in more remote or rural areas (eg Akaroa and Banks Peninsula Bays) the impact on overall air quality will be insignificant.

I should note that I am an affected party on this one – my wife and I own a historic cottage in Kaiapoi which despite being across the road from the Red Zone still has a chimney and fireplace.

I propose that a clause be inserted in the 'Rules' section along the following lines:

"In all areas combustion in an existing non-approved open fire or boiler may continue, provided reasonable efforts are made to ensure clean burning and minimum smoke."

2) This plan appears to make no provision for activities in the coastal marine area which may impact on adjacent areas.

In particular I note the use of heavy fuel oil in ship engines. This is a very high sulphur fuel, and is banned from use in many parts of the world – yet it is allowed to be used in Lyttelton, Timaru and Akaroa Harbours.

There is also a risk that someone wanting to carry out a noxious-discharge activity (eg gaseous fumigation of wood or solvent distillation) will simply do it on a barge or ship to avoid resource consent issues.

Given that Lyttelton and Timaru both have an air quality problem, and houses at similar level to ship funnels, it would be appropriate to at least make provision for monitoring the use of fuel oil in engines and sulphur in the atmosphere, and other uses in the marine area.

Since the last Air Plan was prepared there has also been a marked increase in large ships (cruise ships in particular) visiting the pristine environment of Akaroa Harbour, and discharging their exhaust into the atmosphere. Shore power is not available in Akaroa meaning that generators will be kept running. As with Timaru and Lyttelton it would be appropriate to monitor the use of fuel oil in engines and sulphur in the atmosphere.

ECan staff will have a better idea than I do about what monitoring would be appropriate, but it might involve the Harbourmaster keeping a record of estimated fuel use during large ship visits and occasional helicopter drone or balloon-based sampling of smoke columns from them.

I propose that a clause be inserted into the 'definitions' defining the Coastal Marine Area – perhaps by reference to other Regional Plans.

I further suggest that a new heading be included in Section 6 Policy noting that effects in the Coastal Marine area may have impact on air quality over land, and requiring monitoring of the effects.

And there should be a clause in Section 7 relating to air quality in the Coastal Marine area and controlling cross-boundary effects.

Michael de Hamel

5 Meadow Street, PO Box 84, Kaiapoi.

Ph (03) 327 7622 email michael@akaroamail.co.nz

March 4 2015

While I'd be happy to appear before a submissions committee and explain further or answer questions, I have no particular need to do so.

Which Air Shed does this submission relate to or none

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Michael de Hamel (58211)
Email Address	michael@akaroamail.co.nz
Address	PO Box 84 Kaiapoi 7644
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Michael de Hamel
Submission ID	pCARP-16
Response Date	4/03/15 6:30 PM
Consultation Point	Proposed Canterbury Air Regional Plan (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:

Further to my submission earlier today

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 note that in the first part of my submission I omitted to specify the situation in which an open fire should be allowed - in a historic building. My recommendation should read:

"In all areas combustion in an existing non-approved open fire or boiler may continue in a building listed as a Category 1 or Category 2 historic building in a District Plan, provided reasonable efforts are made to ensure clean burning and minimum smoke."

Air Shed

Which Air Shed does this submission relate to or none

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Michael de Hamel (58211)
Email Address	michael@akaroamail.co.nz
Address	PO Box 84 Kaiapoi 7644
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Michael de Hamel
Submission ID	pCARP-106
Response Date	4/03/15 3:19 PM
Consultation Point	Space heating (View)
Status	Submitted
Submission Type	Web
Version	0.7

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: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Two important sections have been omitted.

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:

Air Plan submission

1)The previous plan included an exception which allowed the use of open fires in historic-listed buildings. This plan does not.

Yes, by invoking the clauses at the bottom of Page 3.2 the use of such fireplaces could be argued to be an existing use, there are potential complexities if for example brickwork were to be replaced – which might trigger a local authority consent process.

While there are probably very few listed buildings with extant fireplaces and chimneys, to maintain the historical integrity of form and function their use should continue to be permitted, with care and attention to fuel quality, in all areas.

Given the very small number of properties involved, and that many will be in more remote or rural areas (eg Akaroa and Banks Peninsula Bays) the impact on overall air quality will be insignificant.

I should note that I am an affected party on this one – my wife and I own a historic cottage in Kaiapoi which despite being across the road from the Red Zone still has a chimney and fireplace.

I propose that a clause be inserted in the 'Rules' section along the following lines:

"In all areas combustion in an existing non-approved open fire or boiler may continue in a building listed as a Category 1 or Category 2 historic building in a District Plan, provided reasonable efforts are made to ensure clean burning and minimum smoke."

2) This plan appears to make no provision for activities in the coastal marine area which may impact on adjacent areas.

In particular I note the use of heavy fuel oil in ship engines. This is a very high sulphur fuel, and is banned from use in many parts of the world – yet it is allowed to be used in Lyttelton, Timaru and Akaroa Harbours.

There is also a risk that someone wanting to carry out a noxious-discharge activity (eg gaseous fumigation of wood or solvent distillation) will simply do it on a barge or ship to avoid resource consent issues.

Given that Lyttelton and Timaru both have an air quality problem, and houses at similar level to ship funnels, it would be appropriate to at least make provision for monitoring the use of fuel oil in engines and sulphur in the atmosphere, and other uses in the marine area.

Since the last Air Plan was prepared there has also been a marked increase in large ships (cruise ships in particular) visiting the pristine environment of Akaroa Harbour, and discharging their exhaust into the atmosphere. Shore power is not available in Akaroa meaning that generators will be kept running. As with Timaru and Lyttelton it would be appropriate to monitor the use of fuel oil in engines and sulphur in the atmosphere.

ECan staff will have a better idea than I do about what monitoring would be appropriate, but it might involve the Harbourmaster keeping a record of estimated fuel use during large ship visits and occasional helicopter drone or balloon-based sampling of smoke columns from them.

I propose that a clause be inserted into the 'definitions' defining the Coastal Marine Area – perhaps by reference to other Regional Plans.

I further suggest that a new heading be included in Section 6 Policy noting that effects in the Coastal Marine area may have impact on air quality over land, and requiring monitoring of the effects.

And there should be a clause in Section 7 relating to air quality in the Coastal Marine area and controlling cross-boundary effects.

Michael de Hamel

5 Meadow Street, PO Box 84, Kaiapoi.

Ph (03) 327 7622 email michael@akaroamail.co.nz

March 4 2015

Make Submission

Consultee	Michael de Hamel (58211)
Email Address	michael@akaroamail.co.nz
Address	PO Box 84 Kaiapoi 7644
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Michael de Hamel
Submission ID	pCARP-74
Response Date	4/03/15 3:19 PM
Consultation Point	7 Rules (View)
Status	Submitted
Submission Type	Web
Version	0.4

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:

Two important sections have been omitted.

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:

Air Plan submission

1)The previous plan included an exception which allowed the use of open fires in historic-listed buildings. This plan does not.

Yes, by invoking the clauses at the bottom of Page 3.2 the use of such fireplaces could be argued to be an existing use, there are potential complexities if for example brickwork were to be replaced – which might trigger a local authority consent process.

While there are probably very few listed buildings with extant fireplaces and chimneys, to maintain the historical integrity of form and function their use should continue to be permitted, with care and attention to fuel quality, in all areas.

Given the very small number of properties involved, and that many will be in more remote or rural areas (eg Akaroa and Banks Peninsula Bays) the impact on overall air quality will be insignificant.

I should note that I am an affected party on this one – my wife and I own a historic cottage in Kaiapoi which despite being across the road from the Red Zone still has a chimney and fireplace.

I propose that a clause be inserted in the 'Rules' section along the following lines:

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2) This plan appears to make no provision for activities in the coastal marine area which may impact on adjacent areas.

In particular I note the use of heavy fuel oil in ship engines. This is a very high sulphur fuel, and is banned from use in many parts of the world – yet it is allowed to be used in Lyttelton, Timaru and Akaroa Harbours.

There is also a risk that someone wanting to carry out a noxious-discharge activity (eg gaseous fumigation of wood or solvent distillation) will simply do it on a barge or ship to avoid resource consent issues.

Given that Lyttelton and Timaru both have an air quality problem, and houses at similar level to ship funnels, it would be appropriate to at least make provision for monitoring the use of fuel oil in engines and sulphur in the atmosphere, and other uses in the marine area.

Since the last Air Plan was prepared there has also been a marked increase in large ships (cruise ships in particular) visiting the pristine environment of Akaroa Harbour, and discharging their exhaust into the atmosphere. Shore power is not available in Akaroa meaning that generators will be kept running. As with Timaru and Lyttelton it would be appropriate to monitor the use of fuel oil in engines and sulphur in the atmosphere.

ECan staff will have a better idea than I do about what monitoring would be appropriate, but it might involve the Harbourmaster keeping a record of estimated fuel use during large ship visits and occasional helicopter drone or balloon-based sampling of smoke columns from them.

I propose that a clause be inserted into the 'definitions' defining the Coastal Marine Area – perhaps by reference to other Regional Plans.

I further suggest that a new heading be included in Section 6 Policy noting that effects in the Coastal Marine area may have impact on air quality over land, and requiring monitoring of the effects.

And there should be a clause in Section 7 relating to air quality in the Coastal Marine area and controlling cross-boundary effects.

Michael de Hamel

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March 4 2015

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Please note where the incorrect submission point was, For Example - Was at Consultation Point 11.5.7 and you have then moved it to 11.59.7

You MUST record the original location of the incorrect point

Planner - Incorrect Location of Submission Point

general

Please summarise decision requested

Planner - Summary of Decision Requested

Insert new rules relating to air quality in the Coastal Marine area and controlling cross-boundary effects.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Reject

Tick relevant topics

Make Submission

Consultee	Michael de Hamel (58211)
Email Address	michael@akaroamail.co.nz
Address	PO Box 84 Kaiapoi 7644
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Michael de Hamel
Submission ID	pCARP-73
Response Date	4/03/15 3:19 PM
Consultation Point	6 Policies (View)
Status	Submitted
Submission Type	Web
Version	0.7

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: . Oppose

Please state your reasons for supporting/opposing/amendments sought

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Planner - Incorrect Location of Submission Point

general

Please summarise decision requested

Planner - Summary of Decision Requested

Insert policy noting that effects in the Coastal Marine area may have impact on air quality over land, and requiring monitoring of the effects

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Reject

Tick relevant topics

Make Submission

Consultee	Michael de Hamel (58211)
Email Address	michael@akaroamail.co.nz
Address	PO Box 84 Kaiapoi 7644
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Michael de Hamel
Submission ID	pCARP-72
Response Date	4/03/15 3:19 PM
Consultation Point	2 Definitions and Interpretation (View)
Status	Submitted
Submission Type	Web
Version	0.6

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

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Michael de Hamel

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You MUST record the original location of the incorrect point

Planner - Incorrect Location of Submission Point

general

Please summarise decision requested

Planner - Summary of Decision Requested

Insert a definition for Coastal Marine Area – perhaps by reference to other Regional Plans

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Reject

Tick relevant topics