

The Proposed Canterbury Air Regional Plan  
Environment Canterbury  
PO Box 345  
Christchurch 8140

From:

L. Pickering,  
Email Address -m8r-ovhrqg@mailinator.com

**Re: Submission on proposed Canterbury Air Regional Plan.**

Please see the following submission.

I wish to speak in support of my submission

Thank you,

L. Pickering.

**L. Pickering, 1<sup>st</sup> May 2015**

**Submission on proposed Canterbury Air Regional Plan.**

I oppose:

- Any restrictions on burning of vegetation and other burnable waste because this is an important tool I use in the management of my property. (Note this tool has been in use on this property for a minimum of 100 years up until now, and you have not proposed any suitable low or no-cost alternative).
- Any restrictions or requirements to phase out existing open fires or log fires, particularly in rural and/or low density housing areas.
- The imposition of a 'clean air zone' on my property and surrounding environs

Please note I wish to speak to this submission.

## **Background**

I own rural property that is captured by your 'Proposed Canterbury Air Regional Plan', dated March 2015.

My property is very low density (one dwelling on > 2Ha) and is surrounded by other low density sites, we do not generate high ratios of pollution and are not significantly affected by adjoining properties going about their normal activities with regard to fires, both indoor and outdoor.

Much of your proposal would be implemented at the expense of normal use and enjoyment of our (rural) properties, at high cost to us, and for the benefit of others, apparently with no compensating factors introduced.

## **Your proposal – science and impact**

I understand your measures are intended to promote 'cleaner' air for much of residential Christchurch City.

Your reasons appear to be based solely on the measurement of 'PM10', and you have reached a very broad conclusion on this, smoke from burning and the effect on residents.

I further understand that your measurements are sparsely interspersed (and are many kilometres from me).

Your conclusions have resulted in you wanting to widely phase out or severely limit existing fires.

I question the science, cost, value and applicability of your conclusions and proposal, particularly to us in rural areas.

It is not clear to me that there is quite the direct relationship between health and fire equipment (and rural fires) such as you suggest.

I submit that fuel and use of equipment is likely to have just as big (if not bigger) impact than the equipment itself, that the impact on health of low density (rural) areas is likely to be very low in comparison to higher-density residential areas, and that PM10 is not necessarily the best indicator.

Therefore I suggest that you should more specifically assess and understand the impact from and to other areas before globally and somewhat nebulously imposing restrictions as you have.

Additionally if you are going to impose restrictions for the benefit of others then you should compensate us for this.

Finally it is not clear to me that you have adequately assessed the cost-benefit and environmental impact of disposing of existing equipment, nor the wider environmental cost of removing sustainable heating devices, nor the very real hazards involved in so severely pushing a mono-energy approach.

This is not good science, nor regulation, and these issues should be addressed before considering such a proposal further.

### Definition – Urban

Your definition of urban (because it specifically states ‘any site or area zoned...’) unfairly captures properties who have had other than rural zoning imposed upon them by yourselves, yet who clearly have, and continue to, operate(d) in a rural manner.

I specifically refer you to private plan change 67, imposed as ‘Amendment 4’ to the Christchurch City Plan by the CERA/Minister Brownlee at your request.

I note that:

- The proposal of a private company, Highfield Park Ltd and associated individuals, to develop the area (against our wishes) has **failed because that company is now in liquidation**.
- The area, and our property, **remains rural in nature and in use**.
- At the hearing for this private plan change, at appeal, and in submission to you we have implacably opposed the introduction of this proposal because it **unfairly impacts on our rural environment and activities**, and that any (dubious) **benefits accrue to others at our expense**.
- In the hearing decision, and in Amendment 4, **rural activities** have been (unfairly in our view) limited but still some are **still permitted**.
- The use of fires is a rural activity that we believe is captured by this permission, **yet could be prohibited** by your air plan as written.

Accordingly I request you change your definition of ‘Urban’ to be:

- Urban: Means any site or area zoned for residential, commercial or industrial activities, excluding those where rural activities, such as fires, have been lawfully established before this proposal became operative or the proposed plan was notified, and the effects of the use are the same or similar in character, intensity, and scale to those which existed before the rule became operative or the proposed plan was notified

I note this follows much of s10 of the Resource Management Act 1991.

And, if needed, to include a definition of rural that states:

- Rural: site or area zoned rural or where rural activities, such as fires, have been lawfully established and constitute an existing use or where there is:
  - a) a predominance of natural features over man made features
  - b) a high ratio of space not built upon (open space) to built upon space on individual sites.
  - c) the presence of large areas of vegetation, in the form of grass, trees, crops and indigenous vegetation.
  - d) a low density of building and structures because site sizes are in hectares rather than square metres.