

Make Submission

Consultee	Peter and Kate Croft and Bovett (60575)
Email Address	bovett.croft@paradise.net.nz
Address	178 Moncks Spur Rd Morten Settlement Christchurch 8081
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Peter and Kate Croft and Bovett
Submission ID	pCARP-391
Response Date	1/05/15 12:19 PM
Consultation Point	13 MANDATORY INFORMATION (View)
Status	Submitted
Submission Type	Web
Version	0.1

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

To Be Heard

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

If so . I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

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Address	178 Moncks Spur Rd Morten Settlement Christchurch 8081
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Peter and Kate Croft and Bovett
Submission ID	pCARP-388
Response Date	1/05/15 12:14 PM
Consultation Point	7.5 Paragraph (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: . Oppose

Please state your reasons for supporting/opposing/amendments sought

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

My property is located on the west facing slope of Moncks Spur, consisting of 2.9 hectares or 7.4 acres of steeply sloping rural land. I maintain and graze a further 1½ acres of adjoining land. My house is at approximately 212 metres above sea level, above the inversion layer and on the edge of the Christchurch Air shed.

It is an example of a property that was strictly rural until the last City Plan changed the zoning to Living HB, which the Christchurch City Plan describes as follows:

1.3.2 Living HB (Hills - Very Low Density) Zone

Zone description and purpose

This zone applies to areas of very low density proposed residential development on the Port Hills, in the vicinity of Hoon Hay Valley, Hyndhope Road, Kennedys Bush Road above Landsdowne Valley,

Worsleys Road and on the higher slopes of Cashmere and Mt Pleasant/Moncks Spur... The zone on Mt Pleasant/Moncks Spur is intended to minimise the visual effects of urban development for the City and local amenities , and to enable the continuation of rural activities (my highlighting).

My land was part of the original Mt Pleasant Run and 1 st farmed in 1846. Sheep have been grazed for 168 years. The current boundaries were established 100 years ago after a subdivision into small blocks for horticulture and flower growing on the gentler sloping land with the steep land retained for grazing.

The land is subdivided into small paddocks with the historic growing areas sheltered by extensive plantings. I have over one kilometre of mixed hedge faces (pine, macrocarpa and oleara) an additional 100 mature pine trees that are not included in the aforementioned shelter belts, 20 Eucalyptus trees, well over a dozen fruit trees, half a dozen (millennium) Oaks and a number of specimen trees including Elm, chesnut etc.

Trimming and pruning this vegetation is a never ending and sometimes a thankless task, but it is part of the job of maintaining a rural property. A considerable quantity (potentially some tonnes) of green waste is created every year in order to keep my property in good condition. Storms and strong winds cause limbs to be lost and severe weather can exacerbate this.

I currently dispose of the majority of this organic waste by outdoor burning as permitted by the operative Natural Resources Regional Plan Rule AQL29, and within the additional rules for outdoor burning imposed by the Christchurch City Council, and the various fire regulations. This can generally only occur in a very narrow window in spring and autumn.

Rule AQL29 Outdoor burning of vegetation, paper, cardboard and untreated wood – permitted activity
Activity

Conditions

*Subject to Rule AQL35, AQL36 and AQL37, the discharge of contaminants into air from outdoor burning of vegetation, paper, cardboard and untreated wood, and a minor and incidental amount of material specifically excluded from Rule AQL36 (a), (d), (e), (i) and (l) within that rule, but excluding standing crop residue or vegetative stubble provided for in Rule AQL28, is **permitted activity** .*

The discharge shall not occur within 100 metres upwind, or 50 metres in any other direction, from any sensitive activity that is not located on the property where burning occurs.

2. The discharge shall not occur within a residential area.

For the purpose of this condition, when outdoor burning is occurring as part of a rural production land activities, a residential area

does not include a property that:

(a) before being rezoned to residential or living is used for rural production activities; and

(b) the original area of land used for rural production activities at the time of rezoning continues to be used for rural production

activities; and

(c) the effects of the outdoor burning are of the same or similar character, intensity and scale to the rural management burning practices which occurred prior to rezoning.

3. Burning shall only occur of vegetation, paper, cardboard and untreated wood sourced from no more than 2 adjoining properties where that vegetation, paper, cardboard and untreated wood has been derived or used, and burning shall be undertaken on one of those properties.

4. The dispersal or deposition of particles shall not cause an objectionable or offensive effect beyond the boundary of the property where the discharge originates.

5. Only small quantities of petroleum products, up to 10 litres per fire, may be used as accelerants.

The only input into this burning process is manpower to heap up the waste and manage the burning.

The proposed blanket ban of all outdoor burning in areas **zoned** as urban does not recognise that properties such as mine remain rural in character and use, and particularly for steep hill country removes a practicable management tool for the maintenance of that land, and therefore compromises its existing productive and amenity use.

The amenity value of the area is recognised with Moncks Spur Rd and various walking tracks well patronised by recreational users who enjoy the rural nature. Outside my gate the ChCh City Council provides seating and a water supply for athletes, trampers, walkers, and their dogs too with a dog water bowl being provided.

The alternative option for waste disposal presented in the s32 report (transfer of waste to composting facility) is a simplistic solution that is not practicable in my situation, or for other similar rural properties.

If I were to move the waste off my property, the sloping nature of the land, some very steep, and with no formed access makes the use of conventional commercial road vehicles on all but a tiny portion of the property impracticable, with only tracked vehicles such as bulldozers and diggers being able to be used.

I submit that the following negative consequences will occur with an outdoor burning ban:

- 1 There will be considerable additional cost to land owners through dumping fees and the hire or purchase of heavy machinery and/or contractors to move and transport the waste to an approved facility.
- 2 There will be a substitution of relatively benign wood smoke pollution with more harmful diesel machinery discharges from transportation of equipment to and from the site, on-site machinery use and those required to make the journey backwards and forwards to the disposal facility where ever it may be sited.
- 3 There will be a direct substitution of potential nuisance smoke with nuisance noise from machinery which might also include extensive use of noisy vegetation shredding machines.
- 4 There is an increased risk of land slope subsidence through the use of heavy machinery.

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 request the following changes be made to allow for continued burning of organic material for rural land within urban zoned areas.

Proposed Change to Rule 7.5

7.5 The discharge of contaminants into air anywhere in the Region from outdoor burning that does not comply with rules 7.6 - 7.13 7.14 and their conditions, is a prohibited activity.

Proposed New Rule 7.14

7.14 In urban areas, where the land area is greater than 2 ha, and the use is for rural production activities the discharge of contaminants into air from the outdoor burning of vegetation and untreated wood is a permitted activity provided the following conditions are met:

1. The discharge only occurs between 1 September and 30 April; and

2. The material has been left to dry for at least 6 weeks prior to burning and within the two days prior to burning there has been less than 5mm of rainfall so that the moisture content is unlikely to exceed 25% dry weight; 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.

Air Shed

Which Air Shed does this submission relate to or none

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Peter and Kate Croft and Bovett (60575)
Email Address	bovett.croft@paradise.net.nz
Address	178 Moncks Spur Rd Morten Settlement Christchurch 8081
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Peter and Kate Croft and Bovett
Submission ID	pCARP-389
Response Date	1/05/15 12:17 PM
Consultation Point	7.81 Paragraph (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:

There has been a huge loss in our ever dwindling stock of heritage buildings, a loss accelerated in Christchurch recently by the devastating Canterbury earthquakes. Heritage in Christchurch is in crisis.

In 2009 the CCC listed 599 buildings and objects in the District Plan (List of Protected Buildings, Places and Objects), in 2015 only 379, a loss of 220. Some of the surviving 379 are not buildings, others not dwellings. Many if not most of those dwellings suffered fatal chimney damage which leaves, I believe, only a handful of buildings capable of operating an open fire.

The Proposed Canterbury Air Regional Plan Appendix 9 has included a separate list of heritage buildings from that in the Christchurch City Council District Plan and then reference generally to Heritage NZ Category 1 buildings. I submit that there should be consistency between the identified heritage lists.

The Regional Council states (sect 32) that open fires within Christchurch are now no longer an issue in relation to pollution and that very few open fires are still in use.

The Regional Council has acknowledged there has been a significant decrease in emissions from the 3 main sources (industry, motor vehicle and home heating) with home heating decreases being by far the most significant. The latest Council commissioned GNS report shows the % "pollution" from home heating sources has further decreased from the figures in the Sect 32 report which appear not to relate to the much higher figures used in the Proposed Canterbury Air Plan

It has also been acknowledged that over the last 12 months (May 2014 to May 2015) there has been only one high pollution night where the contributing emissions from home heating were a significant contributing factor.

I submit that the authentic restoration or continued use of all available heritage buildings should be encouraged. An additional restriction on the use of open fires to only selected heritage properties will not encourage their preservation and risk further diminishing of our threatened cultural heritage.

Preservation will and must be encouraged by including a wider range of heritage buildings including those on the Historic Places Trust categories 2, 3 and 4, and all buildings listed in the Christchurch City Council list of Protected Buildings Category 1 to 4

In view of the very small number of buildings, the loss of appetite for regular open fire use, the unacceptable and detrimental effect that installation of modern heating devices have on the fabric of heritage structures and the acknowledgement by the Regional Council that open fire use is no longer an issue, that it would be inconsequential to achieving PM10 targets to extend the number of heritage properties permitted to maintain their open fires.

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 request that the following change be made to rule 7.81

Proposed Change to Rule 7.81 (changes underlined)

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 the Christchurch City Council District Plan Protected Buildings Category 1, 2, 3, and 4 or a heritage building that is listed as a Category 1, 2, 3 or 4 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).

Air Shed

Which Air Shed does this submission relate to or none

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Peter and Kate Croft and Bovett (60575)
Email Address	bovett.croft@paradise.net.nz
Address	178 Moncks Spur Rd Morten Settlement Christchurch 8081
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Peter and Kate Croft and Bovett
Submission ID	pCARP-390
Response Date	1/05/15 12:18 PM
Consultation Point	Central Policies Applying to All Activities (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:

The Section 32 report (section 3-6 Issues and Responses) states:

Transport emissions are included in the PM 10 reduction strategy but are not addressed in the pCARP because the Plan can only have limited influence over these emissions. Transport emissions are driven more by land use patterns and national regulation. While vehicle numbers have grown significantly since 2002, emissions from the transport sector have remained around the same and this is due to national standards improving fuel and vehicle technology.

I submit that this lack of measures in the plan is not acceptable given that motor vehicles (not including off road diesel vehicles) contribute about 20% of the PM10 emissions in Christchurch (*Air Quality Status Report Christchurch Airshed. Environment Canterbury. December 2014*). The proportion of vehicle emissions is increasing relative to the total emissions from all sources.

This failure to address a significant percentage of PM10 emissions, effectively requires domestic & industrial emitters to reduce their emissions more than would otherwise be necessary and therefore imposes an unequal and unreasonable cost upon them.

Options over and above those being managed at a national level to address transport pollution could include controls on the types and required maintenance standards of public transport vehicles permitted to operate in the various air sheds; and the requirement for designated port areas and other high volume transport hubs to manage an envelope of total vehicle emissions for their site (noting that there are two 'inland ports' proposed for Christchurch and Rolleston).

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 request that the Council add appropriate policies and rules to control and encourage reduced vehicle emissions from vehicles.

Air Shed

Which Air Shed does this submission relate to or none

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Peter and Kate Croft and Bovett (60575)
Email Address	bovett.croft@paradise.net.nz
Company / Organisation	Peter Croft and Kate Bovett
Address	178 Moncks Spur Road Morten Settlement Christchurch 8081
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Peter Croft and Kate Bovett (Peter and Kate Croft and Bovett)
Submission ID	pCARP-2941
Response Date	1/05/15 12:14 PM
Consultation Point	Outdoor burning (View)
Status	Submitted
Submission Type	Web
Version	0.3
Support Oppose	

Supports in Part or Opposes in Part

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Proposed New Rule 7.14

7.14 In urban areas, where the land area is greater than 2 ha, and the use is for rural production activities the discharge of contaminants into air from the outdoor burning of vegetation and untreated wood is a permitted activity provided the following conditions are met:

1. The discharge only occurs between 1 September and 30 April; and

2. The material has been left to dry for at least 6 weeks prior to burning and within the two days prior to burning there has been less than 5mm of rainfall so that the moisture content is unlikely to exceed 25% dry weight; 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.

Please summarise decision requested

Planner - Summary of Decision Requested

Insert a new rule as follows:

In urban areas, where the land area is greater than 2 ha, and the use is for rural production activities the discharge of contaminants into air from the outdoor burning of vegetation and untreated wood is a permitted activity provided the following conditions are met:

1. The discharge only occurs between 1 September and 30 April; and
2. The material has been left to dry for at least 6 weeks prior to burning and within the two days prior to burning there has been less than 5mm of rainfall so that the moisture content is unlikely to exceed 25% dry weight; 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.

Air Shed

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

Choose one of the following three . Recommend Accept in Part

Tick relevant topics