

From: [Sarah Drummond](#)
To: [Mailroom Mailbox](#)
Subject: FW: Summary of Decisions Requested Air Plan
Date: Monday, 13 July 2015 10:12:47 a.m.
Attachments: [AirPlanCross-Submission 2015Melhuish.doc](#)

EC159975

For trimming please

-----Original Message-----

From: Molly Melhuish [<mailto:melhuish@xtra.co.nz>]
Sent: Sunday, 12 July 2015 9:08 a.m.
To: Sarah Drummond
Cc: Pat Palmer
Subject: Re: Summary of Decisions Requested Air Plan

Sarah: please find attached a completed submission. What I sent you friday was missing most of my comments on Robert Cross's submission, and many of the comments on the Canterbury Development Council's.

Please confirm that despite its late arrival, this cross-submission will be considered in the normal way.

Regards,

Molly

Environment Canterbury Regional Council
 Further submission on proposed Canterbury Air Regional Plan, in support or opposition to
 published submissions

Form 6, not available as Word document

Molly Melhuish 04 568 4873, 027 230 5911
 42 Waitohu Rd, York Bay Eastbourne 5013
melhuish@xtra.co.nz

Personal submission: I can gain no commercial advantage.

I am a person representing a relevant aspect of the public interest

I wish to be heard in support.

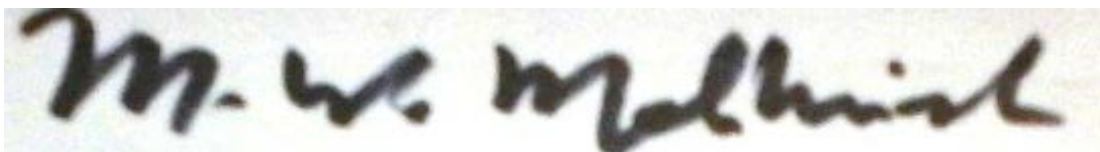
I could consider presenting in joint case, especially with some of the submitters I quoted below, the ones I supported.

I intend to serve each with a copy of this further submission. In most cases I have copied the statements of theirs with which I particularly agree, occasionally making some notes about them. In a separate column I will elaborate where necessary.

I'm afraid that the copy facility in your document is chaotic. I have copied those parts I particularly support (or oppose).

I booked the whole day to respond to submissions, but was only able to address a tiny sample, a very few percent of all the submissions posted, ending with K. Harmer. Here they are presented in the order of your submissions summary. I could find only a few of the submitter numbers.

Unless ECan can offer a more user-friendly means for cross-submissions, you'll just have to struggle with what I've been able to do, in a total of 9 hours' work. [amended to say, 11 hours]



10 July 2015-07-10

<p>Rachel Puentener (62963) pCARP-845</p> <p>(Note, below I omit the prefix pCARP)</p>	<p>"I particularly support the non-regulatory means of cleaning up the air while ensuring work at homes including education on drying your own wood, , on double glazing, sanctions for wood merchants and organisations offering free but unsuitable wood.</p>	<p>I support all that she says, her submission is particularly clear and simple.</p>
<p>Robert Cross (63080)</p>	<p>I oppose the plan based on the process that has been undertaken</p>	<p>I support all he says,</p>

<p>460, 461</p>	<p>en to so call consult. Fur ther the process in tr ying to submitt is realy only suitab le f or v er y liter ate people with a high deg ree of computer skills . I don't f eel that less than 300 responses from the 2014 consulting per iod is an adequate measure to base this document on. Y our organisation w asn't suppor ted in that round of in v estigation and I strongly f eel this current proposal to put in place the big r ule book stic k is also going to dr a w a f ar g reater le v el of opposition</p> <p>I w ant this plan to be shelv ed and I w ant Ecan to engage with comm unity g roups proper ly , not ne wspaper adv er tising and a f e w pub lic meeting. Y our organisation needs to set up real an meaningful discussion with g</p>	<p>especially the comment on requiring a high degree of computer skills. The format of this exercise has defeated me, yet my colleagues consider me unusually computer- literate.</p> <p>I agree with him that this plan should be shelved and ECan should engage with community groups properly,</p> <p>“Y our organisation needs to set up real an meaningful discussion with g roups who represent the v ar ious comm unities</p> <p>Hear! Hear!</p>
-----------------	--	--

	<p>roups who represent the v ar ious comm unities</p>	
<p>Canterbury Dev't Corp 503</p>	<p>Canterbury Development Corporation CDC supports the Councils stated objective to seek to deliver regulation that “provides f or industrial and economic growth in appropriate areas”.</p> <p>The requirement for industry offsets will It will also create a windfall asset for those currently emitting (or possibly just with a consent to discharg e) in that their consents will now have a potential capital value as well as supporting operational activity. This new value will create a new market</p> <p>Establishment of c ouncil brokered offset programmes . This could for example be delivered through the non - regulatory programmes listed in the introduction to the plan. The “ Warm homes/clean air - in home initiatives ” for example, states that it “ may include encouraging households to move away from wood burners</p>	<p>Comment: <i>Yes, but growth which incorporates the most cost- effective ways of reducing impacts, air and other impacts.</i></p> <p>An important comment – regulation will create a market, with windfall asset for present emitters. I OPPOSE this unintended consequence,</p> <p>I OPPOSE any council- brokered offset programmes, this must be done by an independent arbitrator/ regulator.</p>

	<p>”</p> <p><i>The Warm Homes initiative must not deprive people of wood burners, an essential backup in case of emergency</i></p> <p>The offsets policy has effectively put in place a “cap and trade” model for PM 10 emissions , capping the amount within each of the airsheds to current activities</p> <p>Domm3n5,</p> <p>.</p> <p>This will create a tangible asset for company balance sheets that are already consented or are operating large vehicle fleets in the air shed and provide a one</p> <p>-</p> <p>off opportunity for home owners with a solid fuel burner to ‘sell their fire’</p> <p>current activities</p> <p>.</p> <p>This will create a tangible asset for company balance sheets that are already consented or are operating large vehicle fleets in the air shed and provide a one</p> <p>-</p> <p>off opportunity for home owners with a solid fuel burner to ‘sell their fire’</p>	
--	---	--

[Canterbury Development Corporation, continued from previous document]

(I could not continue commenting on Canterbury Development Corporation within the table format that I set up, because the quoted parts of the submission could no longer can be entered into my table. I will continue with my comments as a plain text document. I will italicize, boldface and indent my comments.)

The offsets policy has effectively put in place a “cap and trade” model for PM 10 emissions , capping the amount

within each of the airsheds
to
current activities

... a cap and trade model is inappropriate.

This will create a tangible asset for company balance sheets that are already consented or are operating large vehicle fleets in the air

shed and provide a one

off opportunity for home owners with a solid fuel burner to 'sell their fire'

This is really inappropriate, dragging ordinary residents into a market paradigm which, if they come to understand it, will only propel them further into the new monetised culture and away from the more varied set of rights and obligations of the more egalitarian culture that older people grew up in.

CDC

supports the definition of

“

Best practicable option

”

In particular

the inclusion of financial implications to ensure that options, that may provide best environmental outcomes, are not considered practicable if they are not financially viable for private industry or public bodies seeking resource consent.

Yes! I agree options are not practicable if they are not financially viable – and it isn't only private industry or public bodies, but individual wood-burner owners that need to have their financial implications considered.

=====

I copied Robert Cross's submission and my comments onto page 1 of this cross-submission; it became lost after I pasted my signature onto this document. Here I place the excerpts I made, and my comments on them.

Robert Cross (63080)

I oppose the plan based on the process that has been undertaken to so call consult.

Further the process

in tr

ying to submitt is realy only suitab

le f
or v
er
y liter
ate people with a high deg
ree of computer skills

This consultation process is seriously degraded, partly because of the difficulty in writing cross-submissions through the failure of the proper copy and paste function to enable analysis; my colleagues consider me to be highly computer-literate – but this exercise simply defeated me.

▪
I don't f
eel that less than 300 responses from the 2014 consulting per
iod is an adequate measure to
base this document on.
Y
our organisation w
asn't suppor
ted in that round of in
v
estigation

I also saw little difference between this 2015 consultation paper and the 2014 draft plan that preceded it. One thing that troubles me is the extremely long section in the current proposed Plan on the Ngai Tahu perspective – did this arise from a democratic consultation including widely attended hui, or from a more academic exercise in interpretation of Maori understandings and traditions?

and I strongly
f
eel this current proposal to put in place the big r
ule book stic
k is also going to dr
a
w a f
ar g
reater le
v
el
of opposition

As far as I can tell in reading through a few of the submissions, this has proven to be the case.

I w
ant this plan to be shelv
ed and I w
ant Ecan to engage with comm
unity g

roups proper
ly
,
not ne
wspaper adv
er
tising and a f
e
w pub
lic meeting.
Y

our organisation needs to set up real an
meaningful discussion with g
roups who represent the v
ar
ious comm
unities

And I would be very keen to be involved in such a meaningful discussion. Though not a Christchurch resident, my particular interest is in supporting domestic energy consumers (I was convenor of Domestic Energy Users' Network, now in temporary recess). ECan's air policies could well be copied by other regional councils, which could be very damaging New Zealand-wide.

=====

Canterbury District Health Board

Policies that enable all to contribute to the social, economic and cultural life of their society will result in healthier communities than those where people face insecurity, exclusion and deprivation. The diagram

2
below
shows how the influences on
he
alth are interlinked

Objectives: queries meaning of obj. 5.7, what does regionally significant infrastructure mean?

I AGREE!

The CDHB supports policies 6.2

7

-

6.30

, which would enable
discharges to air from
of ultra

-

low emission burners and efficient non

-

emitting appliances, and recognises the importance of incorporating

supporting measures, such as housing improvements and heating schemes.

I AGREE!

... [this gives] sufficient time (15 yr) for households to make changes, likely mitigating adverse effects of changes on household warmth and wellbeing

I DISAGREE, that a 15-year “lifetime” mitigates the adverse effect of a policy to remove fully functional log burners. Some of these will have to be removed even this year! Most approved wood burners deteriorate little with time, and simple maintenance can keep them operating fine.

That
the
Canterbury
Regional
Council (CRC/ECan)
continue to explore the opportunity of providing a consenting pathway to install more ultra-low emission burners in new dwellings, as well as existing dwellings that do not currently have a wood burner.

I AGREE. But even “ultra-low” burners can be made to smoke. The main benefit of the downdraft burner is its ability to burn poorly seasoned or even green wood while maintaining particle emissions to as little as 0.1 gram per kg wood, so long as the fire is burning hot before wood with high moisture content is added. Merchants are likely to run out of dry wood during a cold winter, as was reported recently in Timaru.

Environment
Canterbury is commended for including reference to Transport as a source of air pollution with in the Canterbury Region

I agree, and regret (as they do) that ECan can't deal with it.

===

Roger Duke - not to be heard :-(
rgd 29/4/15

[I have here typed out excerpts from his handwritten submission.)

I believe Ecan should remove all reference to woodburner type and instead conduct an extensive education campaign on how to operate all units within their most efficient and cleanest parameters.

This was one of the primary points in my own submission.

[It should] distance itself from the fundamentally flawed 24 hour PM10 target and negotiate (or do what ever is required) to have this changed to a more sensible 12 month cumulative, or PM2.5 target.

This was recommended by the Parliamentary Commissioner for the Environment; I strongly support it.

Although Christchurch air quality has improved in recent years there does not appear to have been a corresponding decrease in air pollution related hospital admission rates

If the Air Plan is to be credible, this challenge must be taken up – please examine any relation between measured PM10 and cases of death, illness and lost work/ school hours. Please also examine any anecdotal evidence (or study if such exists) between home temperature and/ or dampness, and death, illness or lost productivity.

To heat older homes efficiently and reduce the reliance on electricity. the use of quality, environmentally sustainable wood, as a fuel, should be encouraged

Again this concurs with my submission; environmental sustainability is a cultural and even moral norm held by many New Zealanders, and undue reliance on electricity is wrong. I noted that Austria (and I think many other countries) require two different forms of home heating.

== =

St George's Hospital, large, private. Upgrading boilers, **Lodged by air quality scientist:**

jbluett@golder.co.nz

Wishes to be heard!

“will
not
meet
the
reasonably
foreseeable
needs
of
future
generations;

. . . s
inappropriate
and
inconsistent
with
the
purpose

and
principles
of
the
RMA;

I agree with his referring directly to the objectives of the RMA; this is necessary to discern whether the changes to the proposed plan are driven by the Act and its objectives, or by ulterior motive(s).

Agree generally with his re-wording of objectives to achieve better air quality.

I cannot copy his preferred wording; selecting text from his submission has become even more chaotic. I did read his several suggestions and agreed with them,

This policy has the
potential
to
significantly
constrain
StGeorge's
ability
to
continue
to
utilise
the
boilers
and
generators
it
requires
to
efficiently
operate
the
hospital.

I was surprised about that, as they are using LPG boilers. If these are causing measurable air quality issues, they should surely be better maintained; expanding should also be no problem. LPG is a pretty benign fuel source in terms of particulate emissions.

===

Thomas Pattinson Palmer wishes to be heard
pat.palmer@clear.net.nz

The
present
rules
restricting
the
use

of
wood
for
home
heating
have
denied
people
access
to
the
most
reliable
and
economical
form
of
home
heating.

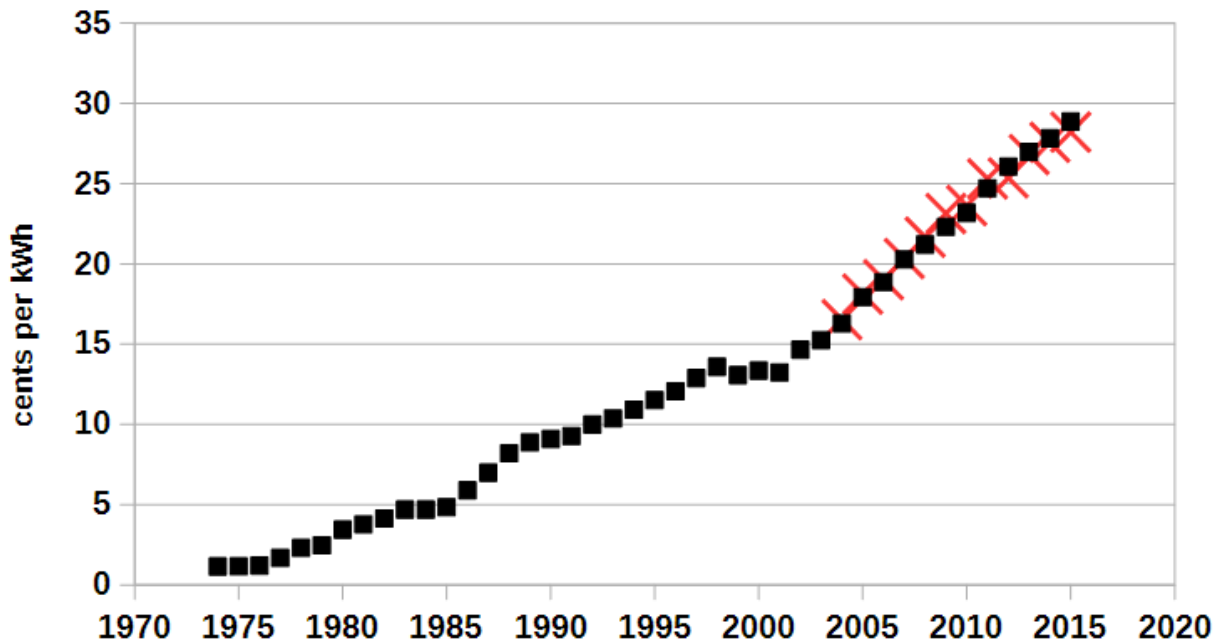
I couldn't agree more!

So
far
this
has
cost
Canterbury
ratepayers
and
householders
some
hundreds
of
millions
of
dollars
in
higher
energy
bills

Worse, removal of log burners will reinforce anti-competitive pricing of electricity, ending up creating a near-monopoly of the home heating market, which will support the ability of retailer-generators to hike prices relentlessly. Here I place the evidence that average residential prices (nominal not real) rose in a nearly steady progression at a half cent per year from 1974 to 2000. From 2000 till 2015 the price rose in an unbroken progression at one cent per year. I consider this to be circumstantial evidence that retailers are charging what the market will bear, not prices related to costs.

Nominal residential electricity prices 1974-2015

source, MBIE data sets - sales-based (squares), QSDEP (crosses)



,
and
in
replacing
perfectly
serviceable
but
out-lawed
appliances.

With the obvious effect of making home heating with wood uneconomic, therefore uncompetitive with electricity despite its relentless price rises. This appears to be a classic case of enabling price rises by suppressing competitors.

This
ECan
induced
energy-poverty
may
well
have
led
to
a
worsening
of
public
health,
not
an
improvement.

Agree, ECan has not provided evidence that the last decade's reduction in PM exceedences has led to reduction of death rates or hospitalisation

A point I believe I made in my personal submission ...

Agree that present restrictions have denied people access to the most reliable and economical form of home heating.

Again, I agree – reliability is important, the more so as extreme climatic events appear to have become more frequent.

Agree the evidence on which the plan is based should be reviewed by experts independent of the architects of the Plan.

===

K. Harmer, 160 Quinns ...? Shirley, Chch 8013
copied from the handwritten submission

“Self=sufficient heating, that is not dependent on any corporate entity, must be considered a HUMAN RIGHT, This is a human rights issue! All the statistical claptrap to the contrary, attributing numbers of respiratory related deaths to atmosphere is quite theoretical, while death in one night, due to no heating, for financial or technical reasons, is a very stark reality.
... “needs to be enshrined in LAW. Made by the People, For the People, NOT laws imposed by Corporate or Government powers, from here or the other side of the world.

This is eloquent confirmation of points made by a Grey Power submission to the Universal Periodic Review of Human Rights, For the 18th session of the UPR Working Group, January 2014

... Regional council should be managing public forest, and investing in super-clean wood burner technologies.”

I agree – regional councils are able to promote appropriate economic development for their constituency, and public forests and super-clean wood burners would not only enable reduction of particle pollution, but also provide affordable heating, create jobs, and not least, significantly reduce global warming emissions.

Henry Pattle Barcham (to be heard), handwritten submission copied below.

7-87, 7-25, 7-26

Homeowners replaced open fires and old-design wood burners with ECan-approved ones, in good faith, stipulating 15 yrs as allowable working life goes against natural justice, is unfair, a ‘one rule fits all’ situation, Wood burners vary in quality of manufacture and usage, some may need replacing after 15 years whereas others are still in good condition.

Change the allowable life to 25 yrs or when condition necessitates replacement
[I DISAGREE, our pyroclassic is > 30 yrs old., and burns as cleanly as ever.]

Airshed on port hills, 200m a.s.l. treated same as St Albans.

Agree: my submission called on buffer zones to be retained as such, instead of forcing the removal of wood burners from areas which are not at present polluted airsheds.

Having warm dry homes in winter is essential for good health. Electricity and gas production and supply systems are vulnerable to adverse conditions. Home heating using a renewable fuel (firewood) must be readily available. Press reports Jan Wright's statement, NAQS rules are o...

Aside from his recommendation for a 25 yr allowance, I strongly agree with his submission. Warm dry homes are essential for health, and a renewable fuel, firewood, is sought by many as a cultural and even moral choice.