

Submission Form: Nelson Air Quality Plan Plan Change A3 (Woodburners)



Return your submission by the advertised closing date to:

Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with plan change no. in subject line)

OFFICE USE	
Submission No:	
RECEIVED	
Date Received Stamp:	18 FEB 2016
NELSON CITY COUNCIL	
RAD No:	Customer Service

on Proposed Plan Change/Variation A3 Woodburners
(Number) (Name)

to the Nelson Air Quality Plan
(Insert name of Plan e.g. "Resource Management or Air Quality")

Submitter Details

Full Name	Mary A. Wilson		
Organisation	self		
Contact Person	"		
Postal address	PO Box 5	Business Phone	—
	Nelson 7040	Home Phone	5391144
		Mobile Phone	—
Email	marywilson@hotmail.co.nz		

Council Hearing

- I/we wish to be heard in support of my/our submission
- (If yes above) I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings

Trade Competition

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

I could could not gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission please complete the following:

I am am not directly affected by an effect of the subject matter of this submission that:

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Public information

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.

Signature of Submitter
(or person authorised to sign on behalf of submitter)

12/2/16
Date

Please note: submissions may only be made on provisions proposed to be changed

Submission Point 1

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances
Reference:	Name: <i>Allowing ^{new} Woodburners - Central Nelson</i>
I support the above Plan Change section <input type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>
I oppose the above Plan Change Section <input checked="" type="checkbox"/>	
Reasons: <i>In 2000 when I moved to central Nelson, for 6 months of the year I could barely breathe, even inside my old villa. Extensive weatherstripping, heavy drapes - still the air was polluted, we could only go outside & have clear air some mid days. We can't return Nelson to even a fraction of that state, especially if inner city living is implemented to bring Nelson to year-long vibrancy.</i>	
The decision I seek from the Council is that this part of the proposed Plan Change be:	
Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input checked="" type="checkbox"/> Amended as follows <input type="checkbox"/>	
Where amendments are sought, provide details below of what changes you would like to see: <i>Allow ultra-low emission burners <u>only</u> + <u>only</u> to replace existing "legal" woodburners. None allowed in homes currently not having legal woodburners.</i>	

Submission Point 2

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances
Reference:	Name:
I support the above Plan Change section <input type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>
I oppose the above Plan Change Section <input type="checkbox"/>	
Reasons:	
The decision I seek from the Council is that this part of the proposed Plan Change be:	
Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>	
Where amendments are sought, provide details below of what changes you would like to see: <i>An added note to NCC } On my street 2 houses belch out vast amounts of smoke most days / afternoons / nights. And I know the burners are very old - how are they allowed + who at NCC checks?</i>	

(Provision for two submission points provided - continue on separate sheets if necessary)

Submitter name: *Mary Wilson*

Submission Form: Nelson Air Quality Plan Plan Change A3 (Woodburners)



Return your submission by the advertised closing date to:

Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with plan change no. in subject line)

OFFICE USE
Submission No:
Date Received Stamp:
RAD No:

on Proposed Plan Change/Variation A3 Woodburners
(Number) (Name)

to the Nelson Air Quality Plan
(Insert name of Plan e.g. "Resource Management or Air Quality")

Submitter Details

Full Name	KATHLEEN COHN		
Organisation	-		
Contact Person	AS ABOVE		
Postal address	999 Bay View Rd	Business Phone	-
		Home Phone	5450279
		Mobile Phone	0273876304
Email			

Council Hearing

- I/we wish to be heard in support of my/our submission
- (If yes above) I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings

Trade Competition

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

I could could not gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission please complete the following:

I am am not directly affected by an effect of the subject matter of this submission that:

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Public information

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.

K. Cohn
Signature of Submitter
(or person authorised to sign on behalf of submitter)

17-2-2016
Date

RECEIVED

18 FEB 2016

Please note: submissions may only be made on provisions proposed to be changed

Submission Point 1

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input checked="" type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons:		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input checked="" type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see:		

Submission Point 2

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input checked="" type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons:		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input checked="" type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see:		

(Provision for two submission points provided - continue on separate sheets if necessary)

Submitter name: K. COHN.

Submission Form: Nelson Air Quality Plan Plan Change A3 (Woodburners)



Return your submission by the advertised closing date to:

Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with plan change no. in subject line)

OFFICE USE
Submission No:
Date Received Stamp:
RAD No:

on Proposed Plan Change/Variation A3 Woodburners
(Number) (Name)

to the Nelson Air Quality Plan
(Insert name of Plan e.g. "Resource Management or Air Quality")

Submitter Details

Full Name	DEREK SHAW		
Organisation	NELSON ENVIRONMENT CENTRE		
Contact Person	Derek Shaw		
Postal address	cl- PO Box 602	Business Phone	03 5487537
	Nelson	Home Phone	03 5487537
		Mobile Phone	
Email	nikau@ts.co.nz		

Council Hearing

- I/we wish to be heard in support of my/our submission
- (If yes above) I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings

Trade Competition

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.


I could could not gain an advantage in trade competition through this submission
If you could gain an advantage in trade competition through this submission please complete the following:

I am am not directly affected by an effect of the subject matter of this submission that:

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Public information

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.


Signature of Submitter
(or person authorised to sign on behalf of submitter)

17/2/2016
Date

RECEIVED

18 FEB 2016

NELSON CITY COUNCIL
Customer Service



Nelson
Environment
Centre

1A Braemar Place,
upper Franklyn St.
Nelson South 7010
Ph: 03 545 9176
info@nec.org.nz
www.nec.org.nz

17 February 2016

RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

Submissions on Proposed Plan Change A3 Woodburners – Air Quality Plan

1. Introduction

The Nelson Environment Centre (NEC) has long been concerned about winter air quality in Nelson and has been supportive of the moves by Nelson City Council (NCC) to improve the quality of winter air, especially in those areas which have historically had the worst air pollution due to high winter levels of particulate matter (PM10) mostly from domestic heating appliances. We note that the winter levels of PM10 have been dramatically reduced and the numbers of exceedances of the National Environmental Standard (NES) for air quality have reduced over the past decade, particularly in the two worst airsheds – A and B1. However, we note in the section 32 report (p6) that none of the four airsheds have yet reached the “acceptable” category. The overall dramatic improvement was acknowledged in 2012 when NCC won two Green Ribbon Awards at the annual awards organised by the Ministry for the Environment.

We note that Council has been under considerable pressure to amend the Air Quality Plan from those that have somehow missed the opportunity to replace their open fire places and old woodburners with a more modern efficient woodburner and others who wish to have the option of installing a wood burner in their existing or new home. The ‘buyer-beware’ principle seems to have been forgotten by some of the people who recently bought homes that did not have a complying burner. There is an equity issue with respect to those who did the right thing earlier and installed more modern burners by the well advertised deadlines and thus did their bit to help achieve the subsequent reductions in PM10 levels. We see it as unfair on those who made the decisions and financial investment earlier if the ‘woodburner door’ is now opened for those who, for whatever reasons, avoided the cost of complying earlier. A further inequity is that those who were funded at considerable cost by Nelson ratepayers to have burners removed, may now be able to re-install an ultra low emission burner (ULEB), partially undoing the gains made in air quality. With the likely toughening of air pollution standards in the future in recognition of the greater adverse human health impacts of PM2.5, it is quite possible that the burners in the same house might need to be removed a second time – with the possibility of ratepayers paying twice.



We acknowledge the investment in ULEBs and other emission control technologies by various companies and note that the current Air Quality Plan anticipates such developments. We support the introduction of such new technologies, particularly where they are replacing older, less efficient wood burners and/or where and when there is capacity to allow additional burners without compromising the plan's goal of maintaining and enhancing air quality.

We also acknowledge the background work that has been undertaken by Council in order to get a better understanding of the state of air quality in Nelson, including dispersion modeling and home heating methods, and the various options for possibly accommodating some UELBs in some airsheds while endeavouring to ensure that winter air continues to improve and complies or will comply with the current NES for air quality.

2. The Precautionary Approach

We support the objective and policies of the Nelson Air Quality Plan and note that the proposed plan change does not propose any changes to these. While we are generally supportive of the proposed provisions to enable small-scale ULEBs in airsheds where and when there has been a clearly demonstrated capacity to accommodate them, we strongly urge Council to exercise the precautionary approach with regards to this proposed plan change, particularly as mentioned above none of the airsheds have yet reached the "acceptable" category.

The NCC in its Regional Policy Statement has adopted the Precautionary Approach with respect to resource management decisions. Given the complexity of air quality issues in Nelson, the difficulties and challenges of having adequate information and the potentially significant adverse effects on the environment, including community health, we believe this proposed plan change is a good example of where the precautionary approach should be applied.

The objective and policies for the precautionary approach state (p31-2):

UP2.2 Objective

UP2.2.1 Resource management decisions which do not, as a consequence of incomplete information, result in significant adverse environmental effects.

UP2.3 Policies

UP2.3.1 To require resource consents to be applied for where:

- i) the knowledge of a resource is limited; and/or*



- ii) *the adverse effects of any activity on that resource is potentially significant and cannot be confidently predicted.*

UP2.3.2 To only grant resource consents where Council is confident that potential adverse effects on the environment can be avoided, remedied or mitigated.

We believe that there are many aspects in the modeling studies and background reports related to the proposed Plan Change that contain assumptions, uncertainties and limited information that contribute, in our view, to the need to be cautious with respect to this proposed plan change. These include:

- The inherent uncertainties in computer modelling where multiple assumptions are made and information is rather limited;
- The variability in climatic conditions over several winters eg the number of occasions each winter when thermal inversion conditions may exist;
- The capacity of airsheds B2 and C to absorb the proposed numbers of ULEB's being considered to be allowed in these 2 airsheds - up to 1000 and 600 respectively;
- The ability of the new ULEB's to meet the proposed 'real-time' emission levels of 0.5 gm per kg of fuel burned;
- The ability of the proposed Behaviour Change Programme to achieve its target, especially if funding and staffing commitment is not maintained and there is a lack of commitment to take enforcement action against repeat offenders;
- The possible changes being signalled to the NES for Air Quality, including the possible change from PM10 to PM2.5 for measuring particulate matter in the future because of the increasing recognition that the smaller particles pose a greater health risk to humans;
- The recognition that there is no safe level for PM10 with respect to adverse human health effects;
- The variability in human behaviours such as how they operate woodburners, which heating sources are used and when by those households with multiple heating options; and
- The variability in human susceptibility to respiratory and other diseases.

Decisions sought:

2.1 That there are no amendments to the objective and policies of the Nelson Air Quality Plan through the proposed Plan Change A3 process.



2.2 That the precautionary approach be applied to all aspects of the proposed Plan Change A3.

3. Allowing ULEBs

We are pleased to see that only ULEBs are proposed to be allowed in two airsheds where it is deemed that the NES for Air Quality has been achieved. We do not believe that any consideration should be given to allowing any further NES burners in any airsheds, especially given the indication that many can exceed the emission standards by 3-4 times. We note that Environment Canterbury (ECAN) is proposing to phase out the current NES burners and only allowing them to be replaced by ULEBs. We would like to see a similar approach considered in Nelson, especially if the household survey shows a high level of interest in being able to install ULEBs. Allowing only ULEBs to be installed as air quality improves would provide a larger number of people the option to be able to utilise wood for home heating than allowing a smaller number of higher polluting NES burners.

Rather than allowing the proposed number of ULEBs to be introduced in airsheds B2 (1000) and C (600) in one stage, we believe that taking a more cautious approach is preferable and allowing for them to be introduced as monitoring clearly indicates that there is an on-going improvement in air quality and also an adequate buffer with respect to being under the NES limits and also very limited dispersion into adjacent airsheds that not yet been deemed to have met the NES limits. Providing monitoring indicates on-going improvements in air quality, we suggest that they be phased in over say 5 years ie 200/year in airshed B2 and 125/year in C. Such a staged approach would enable the effectiveness of the associated Behaviour Change Programme and enforcement to be progressively evaluated and if necessary stepped up.

At this stage, we believe it is premature to make any provision in the plan change for even the possible introduction of ULEBs (other than when replacing an existing woodburner) in airsheds A and B1. We favour a more cautious approach of continuing to monitor the winter PM10 levels in these two airsheds and only allowing ULEBs to be installed when it has been clearly demonstrated for several years that the levels are consistently improving and below the NES levels, including an adequate buffer. At that point a subsequent plan change process could be pursued to allow consideration as to whether ULEBs are able to be installed in airsheds A, B2 or both.

We also favour developing an approach which gives priority to allowing the installation of ULEBs in the homes of those with the highest needs, such as cold un-



insulated or under-insulated houses, occupants with health issues such as respiratory diseases, low incomes, and heating currently undertaken with unflued gas heaters. This approach should be in conjunction with the other non-regulatory methods covered section 5 below.

Given the current building code requirements for insulation and double-glazing in new homes, we do not support ULEBs being able to be installed in new homes or those built since the current insulation and double-glazing standards became operative. New houses should not need any or, at worst, only very limited additional heating in winter which could be relatively easily achieved by other means such as electric heat pump. Allowing ULEBs in new houses may also take away the incentives for good passive solar design and additional levels of insulation and double glazing above the current Building Code, which many people regard as the minimum.

We note that a performance based test or emission limit approach is proposed and note the comments made in the Environet Ltd November 2015 report section 8 about such an approach, in particular determining the emissions levels under 'real life' conditions. The Executive Summary states that "in determining the numbers of ULEB that might be able to be installed it should be noted that there is a higher level of uncertainty around the real life emissions for these burners owing to the absence of in home testing". With such uncertainty we do not believe it is appropriate to allow ULEBs to be installed as a permitted activity, even in airsheds B2 and C. We favour a more cautious approach that requires a public resource consent process and only allows them to be installed over time once it is clearly shown that air quality has improved as a result of behaviour change, natural attrition and/or any other methods or approaches and there has also been an opportunity for 'real life' emissions to be evaluated. We also believe there is considerable merit in "ensuring the potential variability in emissions, through operator behaviour, is reduced so that the operation of burners is as close as possible to the test regime". We thus support the addition of conditions such as those adopted by ECAN that specify "that the emissions must be sustainable in that:

- A burner cannot be operated in such a way as to bypass the technology that results in ultra-low emissions.
- The burner cannot be reasonably tampered with in such a way as to affect its performance. This generally means that it is unable to be tampered with using hand tools available in a home such as screwdrivers, spanners and files.
- If maintenance (such as cleaning and filter changing) is required for the technology to be effective in reducing emissions there must be a process in place that ensures this happens (such as condition of a resource consent).



- The technology for reducing PM10 emissions must be designed to be effective for the duration of the burner's life".

Support:

3.1 Provisions in the proposed Plan Change A3 that only ULEBs will be allowed to be installed in Nelson, ie no additional NES woodburners in any airsheds.

Decisions sought:

3.2 Consideration be given to the phasing out of pre 2004 burners in order to help create capacity for ULEBs, especially if there is a clearly demonstrated demand for additional woodburners, and reductions in PM10 emissions through natural attrition and replacement of old burners with ULEBs and behaviour change and enforcement are not able to provide the prerequisite capacity and buffer.

3.3 Require a public resource consent process for the staged introduction of 1000 and 600 ULEBs in air shed B2 and C respectively over 5 years providing ongoing monitoring clearly demonstrates that the PM10 levels are consistently improving and below the NES standards, including an adequate buffer and that there is no adverse impacts on the air quality in any other airsheds.

3.4 Delete reference to air sheds A and B1 in the plan change.

3.5 Development of a priority system that allows the installation of ULEBs in houses in airsheds B2 and C on a 'high needs' basis that includes criteria around such factors as current level of insulation, occupants health including presence of respiratory diseases, household income with preference for low income, and current heating methods including unflued gas.

3.6 Give consideration to ways of assisting those for whom the financial cost of purchasing and installing an ULEB and improving home insulation is a barrier through facilitating loan schemes with banks or similar lending organisations and/or through a loan scheme tied to the rates on the property.

3.7 Do not permit ULEBs to be installed in new houses or retrospectively in houses built since the current insulation and double-glazing standards in the NZ Building Code became operative.

3.8 That further work be undertaken on the definition of ULEBs to determine how 'real life' emissions will be defined and measured, and that consideration is given to additional requirements such as those specified by ECAN (Environet Ltd November 2015 report p41) namely:

- A burner cannot be operated in such a way as to bypass the technology that results in ultra-low emissions.



- The burner cannot be reasonably tampered with in such a way as to affect its performance. This generally means that it is unable to be tampered with using hand tools available in a home such as screwdrivers, spanners and files.
- If maintenance (such as cleaning and filter changing) is required for the technology to be effective in reducing emissions there must be a process in place that ensures this happens (such as condition of a resource consent).
- The technology for reducing PM10 emissions must be designed to be effective for the duration of the burner's life.

4. Proposed Behaviour Change Programme

It is difficult to judge whether it will be possible to achieve the target of a 10% reduction in domestic PM10 emissions through the proposed Behaviour Change programme. There is very little information in the section 32 report on the success of past and existing public education, behaviour change and enforcement on emissions levels other than the comment that "the 10% target is considered highly achievable based on the success of existing programmes in Nelson and elsewhere in New Zealand". The potential methods that may be utilised make good sense to us but given that the Council has already undertaken a considerable number of these or something similar along with eco building advice as well as some enforcement, we wonder whether much of the 'easy fruit' has already been picked and are concerned that achieving an additional 10% maybe a difficult and challenging target.

We note that the Behaviour Change Programme was regarded as the most cost-effective method to achieve reductions in PM10 emissions but it will very likely require an ongoing commitment of funding and staff time and an ongoing commitment to take enforcement actions against repeat offenders to be successful. We note that there is the potential for such commitments to wane over time with changes in political and staff leadership. A more cautious approach would suggest a lower target initially and further monitoring to check what reduction has been achieved and adopting a more staged approach to allowing the installation of ULEBs once it is clearly demonstrated that the programme is achieving reductions in PM10 emissions. An initial target of 5% may be more achievable.

Decisions sought:

4.1 Set a lower target initially, such as 5%, for the reductions in PM10 emissions to be achieved through the Behaviour Change Programme.



4.2 Council making a long term commitment to the Behaviour Change Programme and if necessary being prepared to step up the programme and enforcement action to ensure that there is a clearly demonstrated improvement in air quality and reductions in PM10 emissions to 'acceptable' levels before allowing the installation of ULEBs in airsheds B2 and C.

5. Other non-regulatory methods

In addition to continuing the eco building design advisor position and developing the Behaviour Change Programme, Council should also consider various other non-regulatory approaches. One such approach would be to help facilitate house owners with the cost of purchasing and installing ULEBs where replacing existing woodburners and in those airsheds where they may be allowed as a result of this plan change and/or the additional retrofitting of insulation and double glazing in old houses. This could be done through assisting house owners and landlords to obtain loan finance through banks or other organisations and/or the reintroduction of the Clean Heat Warm Home Programme or a similar programme that enables ratepayers to pay off such costs via their rates payments.

We acknowledge that Council is contributing financially to the Warmer Healthier Homes Nelson Tasman project, along with the Nelson Marlborough District Health Board, Energy Efficiency and Conservation Authority, and the Rata Foundation to improve the insulation of homes of residents with high needs in terms of health issues, low incomes and lack of insulation. We support this targeting of the most needy and would like to see consideration given to not only continuing the financial contribution to this programme but also to increasing it to enable more people to benefit from warmer and healthier homes and in turn where woodburners are used for heating the reduced consumption of wood will result in PM10 emissions being reduced.

Decisions sought:

5.1 Continuation of the eco building design advisor position for at least another 10 years.

5.2 Consideration of Council providing assistance for homeowners and landlords to obtain loan finance through banks or other financial organisations and/or a similar scheme to the former Clean Heat Warm Home Programme to help cover the costs of purchasing and installing ULEBs and associated insulation and/or double glazing.

5.3 Continuation of Council's financial contribution, and consideration of increasing this contribution, to the Warmer Healthier Homes Nelson Tasman project.

Attn: CHANTELLE.

SUBMISSION ON PROPOSED PLAN Change A3 (WOODBURNERS)

BRENDAN SANTORINI of 19 Strathaven Place Atawhai NELSON, submits:

I WOULD LIKE TO SEE A CHANGE TO THE PLAN ON THE Following Basis:

I live in a area in Strathaven Place where I am surrounded by neighbours that have Woodburners that are relatively inexpensive \$1800 - \$2600, I have lived here for 11 years and had a heat pump for 9 years. Heat pumps are not cheap to run and are not very warm. I would like to install a woodburner like the one I could of bought from a local dealer who sells them (Display Models) on Trademe for \$1800 incl. Flue.

I want to heat my whole home and heat hot water - so I can relieve the pain I get more intensely in Winter in my (R) Leg from MNA 1987 due to Arthritis..

I have plenty of firewood on the property to fuel the woodburner and as I have a disability my income is low and a woodburner would be very easy. Being unable to have a woodburner in my prime situation - Not in the city, Abundance of Wood, and a Disability I feel I am discriminated against as this is a perfect situation to have such a woodfire. (HOME LOTS HERE ARE HALF ACRE LOTS mostly)

I would like to be heard in Support of my Submission Please

RECEIVED
18 FEB 2016

NELSON CITY COUNCIL
Customer Service

BRENDAN SANTORINI

Trade Competition: I could not gain an advantage
Thankyou Feb 17 2016

Pg 2

BRENDAN SANTORINI

▷ 027-245-1911

545-2164

19 Strathaven Place

Awarua

NELSON 7010

Submission Form: Nelson Air Quality Plan
Plan Change A3 (Woodburners)


Nelson City Council
te kaunihera o whakatū

RECEIVED
18 FEB 2016
NELSON CITY COUNCIL
Customer Service

Return your submission by the advertised closing date to:
Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040
(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with plan change no. in subject line)

OFFICE USE
Submission No:
Date Received Stamp:
RAD No:

on Proposed Plan Change/Variation A3 Woodburners
(Number) (Name)
to the Nelson Air Quality Plan
(Insert name of Plan e.g. "Resource Management or Air Quality")

Submitter Details

Full Name	Debbie Beard		
Organisation			
Contact Person			
Postal address	13 Hammill Grove	Business Phone	03 5464826
	Stoke	Home Phone	03 5476736
	Nelson	Mobile Phone	021 1432639
Email	debbie-beard@til-kiwi		

Council Hearing

- I/we wish to be heard in support of my/our submission
 (If yes above) I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings

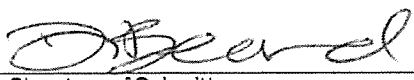
Trade Competition

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

- I could could not gain an advantage in trade competition through this submission
If you could gain an advantage in trade competition through this submission please complete the following:
I am am not directly affected by an effect of the subject matter of this submission that:
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Public information

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.


Signature of Submitter
(or person authorised to sign on behalf of submitter)

17-2-16
Date

Please note: submissions may only be made on provisions proposed to be changed

Submission Point 1

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons: I am not warm enough in winter Need a five heat to fully heat home		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input checked="" type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see: to be able to install a five.		

Submission Point 2

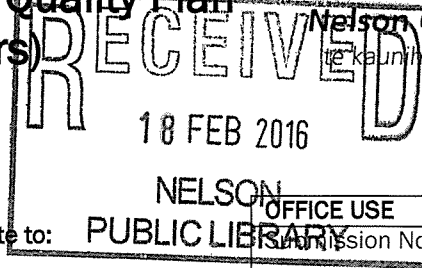
Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons: Yes		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see:		

(Provision for two submission points provided - continue on separate sheets if necessary)

Submitter name:

Submission Form: Nelson Air Quality Plan Plan Change A3 (Woodburners)


Nelson City Council
te kaitiaki o whakatū



Return your submission by the advertised closing date to:
Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040
(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson
7010 or Email to: submissions@ncc.govt.nz with plan change no. in subject line)

Date Received Stamp:

RAD No:

on Proposed Plan Change/Variation A3 Woodburners
(Number) (Name)
to the Nelson Air Quality Plan
(Insert name of Plan e.g. "Resource Management or Air Quality")

Submitter Details

Full Name	GLENN RODNEY MACKAY		
Organisation	RESIDENT RATEPAYER		
Contact Person	GLENN RODNEY MACKAY		
Postal address	12 KING ST	Business Phone	544 6473
	NELSON CITY 7010	Home Phone	—
		Mobile Phone	0211312806
Email	GLENNMACKAY7@GMAIL.COM		

Council Hearing

- I/we wish to be heard in support of my/our submission
- (If yes above) I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings

Trade Competition

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

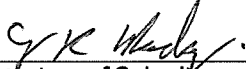
I could could not gain an advantage in trade competition through this submission
If you could gain an advantage in trade competition through this submission please complete the following:

I am am not directly affected by an effect of the subject matter of this submission that:

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Public information

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.


Signature of Submitter
(or person authorised to sign on behalf of submitter)

14-2-16
Date

Please note: submissions may only be made on provisions proposed to be changed

Submission Point 1

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input checked="" type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons: Cheapest form of heating good resources of wood in Nelson. would create employment for supplying wood and burners, maintenance, chimney sweeps etc		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see: choice of NES or ULEB to install make burner ownership transferrable from one property to another.		

Submission Point 2

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons:		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see:		

(Provision for two submission points provided - continue on separate sheets if necessary)

Submitter name: GLENN MACKAY

Submission Form: Nelson Air Quality Plan Plan Change A3 (Woodburners)



Return your submission by the advertised closing date to:

Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with plan change no. in subject line)

OFFICE USE	
Submission No:	
Date Received Stamp:	RECEIVED
	22 FEB 2016
NELSON CITY COUNCIL	
RAD No:	customer Service

on Proposed Plan Change/Variation A3 Woodburners
(Number) (Name)

to the Nelson Air Quality Plan
(Insert name of Plan e.g. "Resource Management or Air Quality")

Submitter Details

Full Name	NITA KNIGHT		
Organisation	—		
Contact Person	NITA KNIGHT		
Postal address	PO BOX 664,	Business Phone	03 546-6454
	NELSON 7040	Home Phone	03 347-9833
		Mobile Phone	
Email	nitad@nelsonmarket.co.nz		

Council Hearing

- I/we wish to be heard in support of my/our submission
- (If yes above) I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings

Trade Competition

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

I could could not gain an advantage in trade competition through this submission

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am am not directly affected by an effect of the subject matter of this submission that:

- (a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Public information

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.


Signature of Submitter
(or person authorised to sign on behalf of submitter)

17.02.2016
Date

Please note: submissions may only be made on provisions proposed to be changed

Submission Point 1

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input type="checkbox"/>	I support in part the above Plan Change Section <input checked="" type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons: <p style="text-align: center;"><i>would like amendments.. as attached.</i></p>		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input checked="" type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see:		

Submission Point 2

Proposed Plan Change provision reference e.g. AQR.26A	Proposed Plan Change provision name e.g. Ultra-low emission burning appliances	
Reference:	Name:	
I support the above Plan Change section <input type="checkbox"/>	I support in part the above Plan Change Section <input type="checkbox"/>	I oppose the above Plan Change Section <input type="checkbox"/>
Reasons:		
The decision I seek from the Council is that this part of the proposed Plan Change be: Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see:		

(Provision for two submission points provided - continue on separate sheets if necessary)

Submitter name: *NE Krueger*

Submission: Nelson Air Quality Plan

Plan Change A3 (Woodburners)

I support the Air Quality Plan Change but with amendments;

1. That Council consider the Plan Change allowing compliant wood burners that meet the National emissions standards into areas that have capacity below the National Air Standards.
2. An education programme put in place regarding how to use wood burners effectively and the effect of burning of wet wood on air quality together with active policing of this. Programme to include Schools – air quality education from an early age.

I would like the option to speak to my submission or have someone speak on my behalf if I am unavailable.

Thank you for your consideration.

Nita Knight.

From: Administration Support
Subject: FW: Woodburner Plan Change

Darryl would like to speak to his submission and he could not gain an advantage in trade competition through his submission.

Bev McShea
Administrator
Nelson City Council / *te Kaunihera o Whakatū*
03 546 0437
www.nelson.govt.nz

My normal hours of work are 7.30am to 3pm Monday to Friday

Please consider the environment before printing this email

From: Submissions
Sent: Monday, 22 February 2016 2:00 p.m.
To: Administration Support
Subject: FW: Woodburner Plan Change

From: Darryl[SMTP:RADIOTV.TRAINING@CLEAR.NET.NZ]
Sent: Monday, February 22, 2016 1:58:25 PM
To: Submissions
Cc: Chantel de Ru
Subject: Woodburner Plan Change
Auto forwarded by a Rule

Dear NCC

I realise the submissions closed 5 days ago, so please regard this as an appeal to look at particular circumstances.

As we live in Moana Avenue (Airshed B1) and are in our seventies, we are really “too old” to wait for ‘further improvements in air quality over the next few years’ (as the council expresses it). Our need is now. We have a heat pump but it is 15 years old and it is not enough, though it is still operating as it was designed to, and has been recently checked and pronounced healthy. However we feel winter more keenly now. Yet Airshed B1 is required to wait as mentioned above.

We purposely did not apply during the timeframe allowed, when all one was allowed was a pellet burner. As we all know now – and you know now – pellet burners are a more expensive and less efficient way of firing a wood burner, and paying for a permit to use one was not a sensible option. We’d all far prefer to use properly stored dry wood, a technique I learned on the farm during the 1950s. I also learned how to operate a fire that emits minimum smoke in the same era – a technique not forgotten, and not surpassed. But all that was long before

the current crop of urban policymakers were born (and before firelighters such as you buy in the supermarkets were invented).

So what it comes down to is – can I be trusted to operate a wood fire, in a burner, responsibly? Match that with the corollary question – can you be trusted to formulate council policy responsibly?

Therefore, as things currently stand, will we die of old age or will we freeze to death before Airshed B1 becomes suitable?

Darryl & Sandra Ware
115 Moana Avenue
Nelson 7011

Ph: 546 4359