

From: Submissions
Sent: Wednesday, 10 February 2016 12:23 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 10, 2016 12:22:44 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Godfrey Mark Watson
Organisation:
Contact Person:
Address for Service*: 47 Tui Glen Road, Atawhai, Nelson
Email*: gandp.watson@xtra.co.nz
Phone*: 03 9280413
Other Phone:
Mobile Phone: 027 2725588

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances
: I support the above Plan Change section
Reasons: I am not in the habit of making submissions but feel strongly on this matter.

I support the proposal allowing wood burners to be installed. It strikes me as crazy to be pushing people to electric heating systems when there is no appetite in NZ for building more power stations and the costs are so high. Gas is of course limited as well. There is plenty of fuel available for wood burners and it is environmentally friendly to produce more fuel. Yes there is the issue of emissions but with the latest models this is significantly lower than in the past. There is a trade-off between a reasonable level of emissions and the quality heating that wood burners provide. Further, there are of course significant impacts on the environment with using electricity or gas for heating. These impacts are of course mostly outside the Nelson region and so we are not greatly affected by them but we also have a wider responsibility to the environment not just in our own back yard.

Thank You for the opportunity to make a submission.

The decision I seek from the Council is that this part of the proposed plan Change be: : Retained
Where amendments are sought, provide details below of what changes you would like to see: :
Additional Submission Points:

:

From: Submissions
Sent: Thursday, 4 February 2016 5:59 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change - Woodburners

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Jessica, Woodburner SUBMISSION

From: Godfrey Watson[SMTP:GANDP.WATSON@XTRA.CO.NZ]
Sent: Thursday, February 04, 2016 5:58:22 PM
To: Submissions
Subject: Submission on Proposed Plan Change - Woodburners
Auto forwarded by a Rule

Nelson City Council

I will keep this as brief as I can because I know there will be people who will write many pages of submissions. I am not in the habit of making submissions but feel strongly on this matter.

I support the proposal allowing wood burners to be installed. It strikes me as crazy to be pushing people to electric heating systems when there is no appetite in NZ for building more power stations and the costs are so high. Gas is of course limited as well. There is plenty of fuel available for wood burners and it is environmentally friendly to produce more fuel. Yes there is the issue of emissions but with the latest models this is significantly lower than in the past. There is a trade-off between a reasonable level of emissions and the quality heating that wood burners provide. Further, there are of course significant impacts on the environment with using electricity or gas for heating. These impacts are of course mostly outside the Nelson region and so we are not greatly affected by them but we also have a wider responsibility to the environment not just in our own back yard.

Thank You for the opportunity to make a submission.

Regards

Godfrey Watson

From: Submissions
Sent: Wednesday, 10 February 2016 10:49 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 10, 2016 10:48:56 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Turhan Djemal
Organisation:
Contact Person:
Address for Service*: 474 Atawhai Drive
Email*: turhan.djemal@deep-blue-solutions.co.nz
Phone*: 035450205
Other Phone:
Mobile Phone: 021741537

I/we wish to be heard in support of my/our submission: No
(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: No

:
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances (ULEB's)

: I support the above Plan Change section

Reasons: I'm supporting this fully as a definite step in the right direction. I would have liked to see more in the Atawhai area because we've never had any smog or air quality issues that I'm aware of. The fact that NCC don't even see it necessary to install a monitoring station (other than in the wood right next to the CBD?) makes me question the science behind these decisions, but again this is a step in the right direction so I support it. I'd much prefer to see a move towards ULEB rather than the less efficient NES burners so I congratulate council on pushing for these devices. Yes they are expensive but the price will come down as demand increases.

I also note that you're starting to move away from the term "wood burner" in some of the proposal text, but have left it in elsewhere. What material is being burnt to provide heat is irrelevant and it was the completely unscientific and naive decision to ban anything called a "wood burner" that led to this mess. I much prefer the term "ultra-low emission burning device" as it allows for any kind of future technology and concentrates on the issue (emissions) rather than the name of a particular type of heater and the material being burnt.

The decision I seek from the Council is that this part of the proposed plan Change be: : Retained
Where amendments are sought, provide details below of what changes you would like to see: :

Additional Submission Points:

:

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



RECEIVED

11 FEB 2016

NELSON CITY COUNCIL

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	Gregory Christopher West		
Organisation			
Contact Person	Rita Van Ickelekinge		
Postal address	House 2 - 155	Business Phone	03 546 1433
	Vanguard St	Home Phone	03 548 3665
	Nelson	Mobile Phone	021 121 0735
Email	gregandritavan@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)

10/02/2016
 Date
 10th Feb

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 checked="" type="checkbox"/>
Reasons: Denies Ratepayer/Citizens access to installing NES approved Burners - whereas all other NZ Councils allow/promote installation - all citizens still refers to PM10 - Government Standards which are about to reviewed - with a total change focus		
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: Allow for existing homes to replace with NES New Homes ULEB, & NES in Airshed A./other As relates to >redundant/irrelevant PM10 modelling data		

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 checked="" type="checkbox"/>
Reasons: Fails to refer to PM2.5 - and WHO studies Fails to refer to emerging tech or WHO recommendations Fails to differentiate between Benign PM10 - ie sea salt etc Fails to id/differentiate Industrial/traffic/other toxic PM10 particulate - or provide details Behaviour change initiatives		
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: To Allow all Airsheds - NES limited number New Houses ULEBs - and accepted/approved new tech. Clear uncomplicated, proactive monitoring - Burning Regs		

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

Submitter name: Greg West

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:
04 FEB 2016
NELSON CITY COUNCIL Customer Service
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	David and Robin Hall		
Organisation			
Contact Person			
Postal address	11a Tainui Street	Business Phone	
	Stoke	Home Phone	03 547 5363
	Nelson 7011	Mobile Phone	
Email			

Council Hearing

- I/we wish to be heard in support of my/our submission No
- (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.

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

03 February 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 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"/>
<p>Reasons: We fully support the installation of approved, affordable low emission wood burners. This is an efficient economical home heating method. Has many health benefits - seniors more mobile in a warm environment, chest conditions are less - saving on health budget. Eases financial pressure on electricity account. Could mean more money for food. Well fed children learn better.</p>		
<p>The decision I seek from the Council is that this part of the proposed Plan Change be:</p> <p>Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/></p>		
<p>Where amendments are sought, provide details below of what changes you would like to see:</p>		

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"/>
<p>Reasons:</p>		
<p>The decision I seek from the Council is that this part of the proposed Plan Change be:</p> <p>Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/></p>		
<p>Where amendments are sought, provide details below of what changes you would like to see:</p>		

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

Submitter name: David e Robin Hall

From: Submissions
Sent: Thursday, 11 February 2016 3:08 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Thursday, February 11, 2016 3:08:06 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Margot Souness
Organisation: None
Contact Person: N/A
Address for Service*: 89 Brook Street
The Brook
Nelson 7010
Email*: sourness@me.com
Phone*: 0211314843
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No
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:

Proposed Plan Change provision reference (e.g. AQR.26A): A3 'Woodburner Plan Change'
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Provision for ULEBs to be installed in houses without woodburners.
: I support the above Plan Change section
Reasons: We strongly support the proposed plan. As a family with young children living in a home built in the 1920s, a woodburner would be a reliable and efficient source of heat. Added to that, the benefit of heat in a power cut or emergency situation.

We would be eager to have our names placed on a waiting list for consent as there may be such a limited number becoming available in our area (Airshed C).

The major downside for us would be the significant cost in purchasing and installing a ULEB. Our only option would be to borrow money - I'm sure many others are in a similar position.

The decision I seek from the Council is that this part of the proposed plan Change be: : Retained
Where amendments are sought, provide details below of what changes you would like to see: :
Additional Submission Points:

:

From: Submissions
Sent: Thursday, 11 February 2016 9:49 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Thursday, February 11, 2016 9:48:51 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Lily Lo
Organisation:
Contact Person: Lily Lo
Address for Service*: 12 Taunton Place
Email*: lily_lo_uk@yahoo.com
Phone*: 02102947778

Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

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Proposed Plan Change provision reference (e.g. AQR.26A): Plan change to A3
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):
: I oppose the above Plan Change Section

Reasons: Significant ratepayer money was put towards removing wood burners. The money spent on this, and the gains made, look to be lost to a large extent by revisiting this issue. The measure of low emission wood burners is currently based on PM10 concentrations by which the best low emission wood burners look ok. Best practice internationally considers a range of particulate sizes as they have differing effects on health and the environment. Restricting wood burner discussion to just one measure ignores wider effects of emissions and fails to take into account current best practice.

Furthermore, allowance of wood burners in essence condones an agreed or acceptable level of air pollution. While I am not fully opposed to the notion of this, it seems short-sighted to consider that this 'accepted level of pollution' should be consumed solely through the effect of wood burner use. Based on Council's published documentation, consideration only appears to have taken into account wood burner use for achieving the accepted level of air pollution. For example; the greatest net-benefit from allowing an increase in air pollution may be best derived through relaxation of industry emission requirements, or through allowing an increase in industrial activity. If such consideration has not taken place, and/or is not available for consideration by the community, I fail to see how meaningful debate can occur on whether wood burners should be allowed.

The decision I seek from the Council is that this part of the proposed plan Change be: Deleted and replaced as follows:

Where amendments are sought, provide details below of what changes you would like to see: Delete entirely. Or more thoroughly consider whether wood burners provide the greatest community benefit for the level of air pollution induced, and provide air quality measures based on international best practice.

Additional Submission Points:

From: Submissions
Sent: Friday, 12 February 2016 1:52 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

From: Council Enquiries (Enquiry)
Sent: Friday, February 12, 2016 1:52:24 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Kate Russell
Organisation:
Contact Person:
Address for Service*: 7 Rimu St, Nelson
Email*: katehelenrussell@hotmail.com
Phone*: 0274287911
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No

:
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): a3
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):

: I oppose the above Plan Change Section
Reasons: Allow lower cost woodburners to be available and also to consider resident of Victory to have a discount on pellet burners since we are not allowed to install any woodburners at all.
The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows:
Where amendments are sought, provide details below of what changes you would like to see: Allow lower cost woodburners to be available and also to consider resident of Victory to have a discount on pellet burners since we are not allowed to install any woodburners at all.

Additional Submission Points:

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From: Submissions
Sent: Sunday, 14 February 2016 9:48 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

From: Council Enquiries (Enquiry)
Sent: Sunday, February 14, 2016 9:48:18 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Peter Simon Wood
Organisation:
Contact Person: Peter Wood
Address for Service*: 51 Pohara Valley Road, RD1 Takaka 7183
Email*: plodsaskia@gmail.com
Phone*: 03 5259055
Other Phone:
Mobile Phone: 022 0935 949

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

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:
Proposed Plan Change provision reference (e.g. AQR.26A): A3
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Woodburners

: I support the above Plan Change section
Reasons: The existing restrictions of woodburner installations in our location at the top of Orsman Crescent appears unnecessary given our location being at an altitude where controlled woodburner emissions would have minimal effects on Nelson Air quality. In settled weather, particularly during the winter months an inversion develops often between 50 and 80 metres and this "traps" smoke, fuel and other emissions until this inversion breaks down. Residences above this level contribute less to low level "smog".
The decision I seek from the Council is that this part of the proposed plan Change be:: Deleted and replaced as follows:

Where amendments are sought, provide details below of what changes you would like to see:: I would like to see NES woodburners permitted in those locations 50 metres (or more) above sea level and ULEB burners considered elsewhere, except in the odd location where katabatic wind flows meet causing polluted air to be trapped for extended periods.

Additional Submission Points:
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From: Submissions
Sent: Sunday, 14 February 2016 5:01 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Sunday, February 14, 2016 5:01:26 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Emily Bolton
Organisation: home owner
Contact Person: emily bolton
Address for Service*: 165 Quarantine Road, Annesbrook, Stoke
Email*: jandem@clear.net.nz
Phone*: 035472797
Other Phone:
Mobile Phone: 0211010298

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): clause 5, first Schedule, resource management act 1991(rma)

Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): woodburner plan change

: I support the above Plan Change section

Reasons: As a home owner with no heat source other than portable devices it is essential that this amendment is made. Our home temperature in winter falls far below world health standards and it is only a matter of time before our households health will suffer. It appears extreme that we are no longer able to install a clean air burning fireplace due only to a time frame. If the research had originally been based on each house that could take up the offer at the time still providing an improved air quality what is the reason for the restriction to be still in place." One house One fire allocation" would still fall within the original idea of improving the air quality. I request that homeowners be allowed to take up the offer of installing a clean air wood fuelled fire in the proposed areas if the original deadlines were missed.

The decision I seek from the Council is that this part of the proposed plan Change be.: Retained

Where amendments are sought, provide details below of what changes you would like to see: :

Additional Submission Points:

:

From: Submissions
Sent: Sunday, 14 February 2016 5:23 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Sunday, February 14, 2016 5:22:54 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Paul Young
Organisation: FMG Anderson Point, Port Hedland
Contact Person:
Address for Service*: 10 Waimea road Nelson South
Email*: p.j.young@hotmail.com
Phone*: +61401037520
Other Phone:
Mobile Phone: +61401037520

I/we wish to be heard in support of my/our submission: No
(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: No

: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): A3 Wood burner amendment
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Paul Young

: I support in part the above Plan Change Section
Reasons: I Have scrim walls and i am getting elderly as are my tenants so a wood burner keeps the house warm, Health reasons

The decision I seek from the Council is that this part of the proposed plan Change be.: Retained
Where amendments are sought, provide details below of what changes you would like to see.: A wood-burner approval for my home

Additional Submission Points:
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From: Submissions
Sent: Monday, 15 February 2016 8:46 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Monday, February 15, 2016 8:44:19 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Annabel Claire Norman
Organisation: Independant
Contact Person: Annabel
Address for Service*: 25 Stanley Crescent, Nelson
Email*: acnorman11@gmail.com
Phone*: +64220605471
Other Phone: +643 5484398
Mobile Phone: +64220605471

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): A3
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Woodburner Plan Change

: I support in part the above Plan Change Section

Reasons: I support this Woodburner plan change document in principal but have concerns on a ruling that does not give owners the option of buying an NES or ULEB burner. The present cost of a ULEB burner is an expensive item. All residence should have the option to purchase that which is affordable while being given the recommendation of why they should consider a ULEB. I think some legislation should be included about the purchase of wood - with assurances that wood sales are dry wood only and some penalties may apply to any wood merchants selling green wood. Also the requirement for woodburner owners to ensure flues are cleaned annually.

The decision I seek from the Council is that this part of the proposed plan Change be:: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see:: As above. Owners are given the option to purchase an NES or ULEB burner with a strong recommendation to consider the ULEB. For wood merchants to be liable if selling green wood and for owners to be responsible for cleaning burner flues annually (at least).

Additional Submission Points:

:

From: Submissions
Sent: Friday, 12 February 2016 3:50 p.m.
To: Administration Support
Subject: FW: Nelson Air Quality Plan Change A3
Attachments: 0894_0001.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: judith@jhproperties.co.nz[SMTP:JUDITH@JHPROPERTIES.CO.NZ]
Sent: Friday, February 12, 2016 3:50:02 PM
To: Submissions
Subject: Nelson Air Quality Plan Change A3
Auto forwarded by a Rule



Nelson City Council
te kaunihera o whakatū

Submission Form: Nelson Air Quality Plan Plan Change A3 (Wood Burners)

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

Submitter Details

Full Name	Judith Rosemary Honeybone		
Organisation	-		
Contact Person	As above		
Postal address	14 Fernside St	Business Phone	03 3859386
	Sumner	Home Phone	03 3322044
	Christchurch	Mobile Phone	0274328099
Email	judith@jproperties.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)

Date

25-1-16

Submission Point 1

Proposed Plan Change provision reference or planning map number e.g. A2-13	Proposed Plan Change provision name e.g. Meanings of words	
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: Present woodburne permit no re-applied for by the past owner, we wish to install one		
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:		

Submission Point 2

Proposed Plan Change provision reference or planning map number e.g. A2-13	Proposed Plan Change provision name e.g. Meanings of words	
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:

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


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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	Charmian Koed		
Organisation			
Contact Person			
Postal address	5 Mawre St	Business Phone	
	Nelson 7011	Home Phone	548 6658
		Mobile Phone	
Email	koed@xtra.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

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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:

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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.

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

14.02.16
Date

Submission attached

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:			
<p>The decision I seek from the Council is that this part of the proposed Plan Change be:</p> <p>Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/></p>			
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:			
<p>The decision I seek from the Council is that this part of the proposed Plan Change be:</p> <p>Retained <input type="checkbox"/> Deleted entirely <input type="checkbox"/> Deleted and replaced as follows <input type="checkbox"/> Amended as follows <input type="checkbox"/></p>			
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:

Planning Administrator
RMA Plan Submissions
NelsonCity Council
P O Box 645
Nelson 7040

Submission on Proposed Plan Change A3 Woodburners – Air Quality Plan

Submitter Details:

Full name: Charmian Koed
Postal Address: 5 Maire Street, Nelson 7011
Home Phone: 548 6658
E-mail: koed@xtra.co.nz

Council Hearing

I wish to be heard.

New Definition A2-76 Small-scale ultra-low emission burning appliances.

Submission:

I support in part this section.

Reasons:

I'm concerned that Nelson City Council is allowing ULEBs as permitted activities, and consider that Council should follow a system similar to that used in Christchurch, where approval is granted through the resource consent process with its checks and balances. Their Air Quality Plan also sets out what ULEBs must achieve, something that's missing from the Nelson Plan Change.

Also missing is information about how ULEBs will be tested. It's possible, I would say, that emissions could be higher than modelled for the Plan Change, with the consequence that the estimates could be wrong.

I could not find a definition of "real life" in the document.

The decision I seek:

Specify how ULEBs will be tested and what they must achieve.

Provide a definition of 'real life'.

AQR.26A Ultra-low emission burning appliances (and AQ2B)**Submission:**

I oppose this section.

Reasons:

The Council is giving itself *carte blanche* to make decisions under AQ2B. The Council intends to make decisions about this without the public having any input or right to object. It would not be possible for a member of the public to know when or if ULEBs will be allowed into Airsheds A and B1 (where I live), and if so, how many. I consider that this is wrong, against the expressed aims of the Council and, I would have thought, against the law.

ULEBs need to be tested according to a specified system and the number that can safely be accommodated in an airshed needs to be decided on a case by case basis. They should therefore be allowed by resource consent, not as a permitted activity.

The ULEBs in Airshed B2 and C are being permitted before the air quality improvements from the behavioural change programme is established, before it is known if the programme will work, and before it is shown by monitoring to have worked. As the rule (via AQ2B) allows a large number of ULEBs to be installed, there is nothing to prevent them being installed in large numbers in early years ahead of any air actual quality gains.

Allowing ULEBs in before air quality improvements occur would worsen air quality and would be contrary to:

- The purpose of the Resource Management Act. People who have to breathe the air would not be able to 'provide for their health'. The life-supporting capacity of air would also be worsened, and there would be adverse effects on health that were not avoided, or mitigated, or remedied. There is plenty of evidence of the effects of fine particle pollution on lung disease and long-term health.
- It would be contrary to the air plan's objective (which is not being changed). If pollution worsened, air quality would not be 'maintained or enhanced' as required by the Objective.
- It would be contrary to Policy A5-1.3. Part c of that policy requires that 'where ..air quality is worse than the 'Acceptable' category in Table A5-2, air quality should be progressively enhanced to an 'Acceptable' level or better'.

The forecast gains in air quality are highly speculative and are theoretical improvements, not actual ones. The Council is counting its chickens before they hatch in allocating space in the B2 and C airsheds before that 'space' is created. ULEBs should only be allowed in after the gains have been proven to have occurred.

A lot of emphasis seems to be, somewhat optimistically, put on behavioural change, something which is both difficult and slow to achieve, if campaigns to reduce smoking, drink driving, speeding and unhealthy eating are any indication. Public education needs to be backed by rules and enforcement. Will the Council actually properly resource enforcement and follow with action on breaches? This is not currently happening, possibly because of pressure from the very vocal pro-woodburner group. If this group continues to object to clean air rules, will the Council actually enforce them? We have no guarantee.

The modelling for Airshed B2 and C seems to be based on very little monitoring data. Environet 2015a says [emphasis added]:

- “Results for air quality monitoring suggest the airshed [B2] is compliant with the NES for PM10” (p18)
- “Airsheds B2 and C appear compliant with the NES for PM10” (p46)
- “Unlike other airsheds the reduction estimated in emissions [for C] is not supported by monitoring data” (p13)
- “The assessments for these areas [B2 and C] are also based on limited monitoring data and therefore contain a higher degree of uncertainty and risk”.

Also, in the Executive Summary Environet 2015a says “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” .

There seems to be a risk over existing air quality levels in B2 and C (because of low levels of monitoring), over the rate of ‘natural attrition’ of existing burner that will free up space for ULEBs, over the type of ULEBs that may get approved and their performance in homes, and over the effectiveness of the behavioural change programme. All of those things create doubt and a combined risk that new burners will be added to these airsheds, but that the modelled counterbalancing improvements in concentrations won’t eventuate – or at least not to the amount forecast.

On top of that, there is no guarantee that the rate that people will want to install new ULEBs in Airsheds B2 and C will match the modelled improvement in air quality over the years (from natural attrition and the behavioural change programme).

Another point to be considered is the fact that international and national standards are likely to move to PM2.5, and the Plan Change and section 32 report make no mention of that. Compliance with this standard is likely to be harder to meet, so it doesn’t seem prudent to add all these extra burners when future standards may mean they, or other burners, have to be taken out again to achieve compliance.

There is already evidence that pollution in B2 also contributes to higher levels in B1, which already is only just meeting the standards and could be pushed over the top by flow on from B2.

Because of all that uncertainty, the installation of ULEBs in B2 and C should only be allowed to occur after the improvement in air quality has occurred – that is, demonstrated by good and reliable monitoring data. To do anything else would be reckless, and could worsen air quality in breach of the plans own Objective and Policy, as discussed above, and cause a worsening in people’s health. A precautionary approach would suggest the proposed approach is premature, may be regretted and may be costly in the future.

(May I, as an aside, note that I have lived in the now designated Airshed B1 for more than fifty years and have experienced the changes from semi-rural to industrial with no restrictions, to the present situation with good safeguards. Before the current Air Plan restrictions on emissions were enacted, air quality was very poor, evidenced at our place by the fact that black soot had to be wiped off our balcony rails every morning. The current Air Quality rules have made a great difference to quality of life in Tahunanui.)

The decision I seek:

- a) Delete entirely the plan change as it relates to Airsheds A and B1.
- b) For Airsheds B2 and C. amend AQR.26A so that:
 - i. The 1000 and 600 ULEBs can only be installed by a public resource consent, and
 - ii. The consent requires proof that the air quality improvement from natural attrition and behavioural management has occurred, and
 - iii. The consent enables the number of ULEBs to be installed over any given period to match the improvement in air quality, and
 - iv. The consent requires proof of the likely 'real life' emissions of the ULEBs that will be installed.

Signed..... *C.A. Koed*

Date..... *14.02.16*

As an addendum, I wish to make the point that I, too, am concerned about the need to provide warm, dry housing and have recently made a submission to the Residential Tenancies Amendment Bill. However, I see no point in trying to solve one problem by possibly worsening another. There are many possible actions to improve housing, most of which would benefit from combined government/council action:

- > warrant of fitness for houses
- > cheaper electricity for domestic heating
- > insulation requirements and assistance for low income families
- > achievement of a living wage

From: Submissions
Sent: Monday, 15 February 2016 12:02 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Monday, February 15, 2016 12:02:24 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Leigh Michael Stevens
Organisation:
Contact Person:
Address for Service*: 21 Mt Vernon Place, Washington Valley, Nelson
Email*: leigh@wriggle.co.nz
Phone*: 021 417 936
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No
:
:

Proposed Plan Change provision reference (e.g. AQR.26A): Change A3 (Woodburners)
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Provision of additional ULEBs, and increase in future when air quality improves
: I support the above Plan Change section

Reasons: There are obvious environmental and health benefits in enabling the installation of new Ultra Low Emission Burners (ULEBs), as well as the ongoing replacement of existing fireplaces with LEBs or ULEBs. There are also very compelling social reasons for allowing home owners to heat their houses with woodburners, from the ability to cook and heat on fires (perfect for civil emergency situations), to the local availability of cheap renewable fuel sources (often vital for low income families who may otherwise be unable to afford heating), to the aesthetic/cultural/psychological value of having a fire.

I endorse the Council using air quality improvements as one means of determining if additional fireplaces can be consented, and as older fires are replaced with ULEBs, there should be an ongoing allowance for more ULEBs to be installed. Such allowances should also consider the most recently available science on potential health impacts, balancing air quality issues against potentially more significantly adverse wider health outcomes from living in poorly heated homes.

The level of risk associated with ULEBs should also be balanced against other potential health impacts such as vehicle emissions, including likely exposure risks and the associated consequences. I believe at present that the risk from woodburners is overstated in relation to other sources.

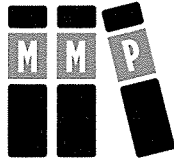
Consequently, I believe Council has an obligation to also consider other causes of air quality degradation and target these at the same time in a comprehensive manner. For example, reductions in vehicle emissions or traffic re-routing may provide more significant improvements than the current woodburner limits. Because there are likely to be many ways to tackle air quality issues, simply targeting woodburners in isolation is not considered an equitable or balanced approach.

The decision I seek from the Council is that this part of the proposed plan Change be: : Retained
Where amendments are sought, provide details below of what changes you would like to see: :

Additional Submission Points: I believe that the current plan limits are overly restrictive in many instances, and that Council should be able to exercise discretion particularly with regard to houses located in the upper reaches of the defined airsheds (i.e. those located predominantly above where the inversion layer is located), and where the contribution to localised air quality degradation from ULEBs is likely to be negligible.

I request that the Council specifically provide allowance for the discretionary consenting of ULEBs above and beyond the limited number of additional woodburner allowances proposed.

:



McFADDEN McMEEKEN PHILLIPS

LAWYERS

12 February 2016

Planning Administrator
RMA Plan Submissions
Nelson City Council
P O Box 645
Nelson 7040

FOR DELIVERY

RECEIVED

12 FEB 2016

NELSON CITY COUNCIL
Customer Service

RE: EUROCELL WOOD PRODUCTS LIMITED - SUBMISSION TO PROPOSED PLAN CHANGE 3 OF THE NELSON AIR QUALITY PLAN

We **enclose** herewith Submission in respect to Plan Change 3 by way of filing.

Please acknowledge receipt.

Yours faithfully

McFADDEN McMEEKEN PHILLIPS

Nigel McFadden
Partner

nigel@mmp.co.nz

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



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 PO Box 645
 Nelson 7040
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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	EUROCEL WOOD PRODUCTS LIMITED		
Organisation	Registered Company		
Contact Person	JUSTINE McDONALD		
Postal address	C/- McLadden hewitson	Business Phone	54 82154
	Phillips	Home Phone	—
	P.O. Box 696 NOLA	Mobile Phone	0274536-606
Email	ngel@wmp.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

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

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Public information

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Eurocell Wood Products Limited
 by its authorised person *[Signature]*

Signature of Submitter

(or person authorised to sign on behalf of submitter)

Date

12.2.2016

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 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: As attached		
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: Withdraw the Change.		

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: Eurocell Wood Products Limited

**SUBMISSION TO PROPOSED PLAN CHANGE A3
OF THE NELSON AIR QUALITY PLAN**

TO: Nelson City Council
PO Box 645
Nelson

SUBMITTER: Eurocell Wood Products Limited, a duly incorporated company having its registered office at Nelson

ADDRESS FOR SERVICE: The Offices of McFadden McMeeken Phillips
Solicitors
PO Box 656
Nelson 7040
187 Bridge Street
Nelson 7010

EUROCELL WOOD PRODUCTS LIMITED hereby makes a submission in opposition to Plan Change A3 (“the Plan Change”).

REASONS FOR OPPOSITION:

1. The Plan Change amends the operative Nelson Air Quality Plan broadly by:
 - Creating a new definition for “*small scale ultra-low emission burning appliances*” (ULEB);
 - A new clause AQR.26A which includes permitted and non-complying rules, assessment criteria and explanatory text in relation to ULEB;
 - Establishes a new Appendix AQ2B setting out the minimum requirements for ULEB including a certification process to be followed in conjunction with the Building Consent process; with
 - Consequential amendments to other operative positions.

2. The structure of the Plan Change is to provide for ultra-low emission burning appliances to be a Permitted Activity (Rule AQR.26A.1) within the urban area in any new building, in any existing building that does not have an operable open fire or small-scale solid fuel burning appliance so long as the appliance:
 - Complies with the requirements of Appendix AQ2B; and
 - Complies with the state requirements in Appendix AQ3; and
 - Burns no fuels in Rule AQR.20 (Prohibited Activities); and

- Is operated so that there is no discharge of excessive smoke (excluding a 15 minute start-up period); and
 - Where any appliances stored in accordance with the rule is successively replaced the replacement small scale ultra-low emitting burning appliance complies with clause (a) of AQR26A.1.
3. Reference to Appendix AQ2B identifies it as being in a number of parts (.1, .2, 3.1, 3.2, 3.3, 3.4) and the Permitted Activity rule requires “*compliance with the requirements of that Appendix (AQR26A.1(ii)(a)(i))*”. It is clearly apparent from the structure of the Appendix that a number of discretions are reserved to the Council, for example:
- (i) Reference to “*real life testing conditions*”;
 - (ii) A certification process “*associated with updated monitoring and modelling after 2015*”.

It appears that for Airshed B2 an analysis has been done – enabling only 1,000 ULEBs and in Airshed C an analysis has been done allowing only 600 ULEBs, but in Airshed A (Hospital and Washington Valley) and Airshed B1 (Tahunanui) ULEBs appear to be able to be installed “*based on an examination of the relationship between winter-time PM10 concentrations and meteorological conditions in Nelson*”, including a step 5:

“To assess the ability for additional burner numbers by considering the extent of capacity available, having regard to:

- *the Council’s inventory of certified burners installed (and therefore the number that may still be certified/installed under the current allocation);*
- *the impact of meteorological conditions on concentrations (including Airshed dispersion); and*
- *real life emission factors and fuel use for new small-scale ultra-low emission burning appliance installations”.*

4. It follows that Council could make that assessment and “*open up*” available capacity for additional burners in Airshed A without going through a public process.
5. It is well established that a Council may not reserve to itself a discretion to finally decide whether any activity is “*a Permitted Activity*” (or not) – the question is whether a rule is sufficiently certain to be understandable and functional. In the case of the rule relating to Airshed A and Airshed B1 Council has reserved to itself a discretion to allow for additional burner numbers having regard to certain matters, there is no certainty, the situation is at best “*fluid*” and therefore the rule is ultra vires.
6. Even if the rule was found not to be ultra vires (reliant as it is on a judgment being made on the final two bullet-points of step 5 for Airsheds A and B1) it provides in effect a priority for “*spare capacity*” to ULEBs as distinct (or better put, in preference to) industry already existing in the Zone – thereby constraining the resource.
7. Under the Plan Change Council can allocate capacity to residential users but industry that might want to use some of that “*available capacity*” achieved are shut out.

8. Even if capacity was available, industry must go through a public consent process, but ULEBs get allocated through a "*internal process*" which is neither public, transparent or open to challenge, thereby giving preference to residential activity over industrial.
9. It seems illogical that the Council should have done a certification process (permitted appliances in Airsheds B2 and C (AQ2B.3.3)) thereby giving certainty, but have not done the same for Airshed B1 and A.
10. It seems the Council has adopted what could be termed a "*short cut*" process with a priority given to residential users. For Airsheds A and B1 (where the Airsheds are either at or over capacity) all applications for ULEBs should be as for industrial uses WHEREBY either a Non-Complying Activity or Discretionary Activity application is required to go through the public planning process.
11. The Section 32 Analysis (to the extent that it exists at all) is inadequate and the requirements of the Act in that regard are not met.

RELIEF SOUGHT:

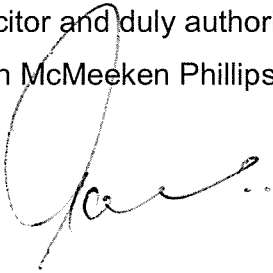
Withdraw the Change.

EUROCELL WOOD PRODUCTS LIMITED

by its solicitor and duly authorised agents:

McFadden McMeeken Phillips

Per:



N A McFadden

Date: 12. 2. 2016

The address for service of the submitter is at the offices of:

McFadden McMeeken Phillips

Telephone: (03) 548 2154

Solicitors

Facsimile: (03) 548 2157

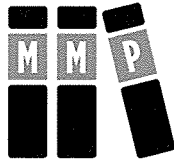
P O Box 656

Nelson 7040

187 Bridge Street

Nelson 7010

4



McFADDEN McMEEKEN PHILLIPS
LAWYERS

12 February 2016

The Planning Administrator
RMA Plan Submissions
Nelson City Council
P O Box 645
Nelson 7040

By Delivery

RECEIVED
12 FEB 2016
NELSON CITY COUNCIL
Customer Service

RE: SOUTHPINE LIMITED

We **enclose** submission by way of filing on behalf of Southpine Limited.

Please acknowledge receipt.

Yours faithfully
McFADDEN McMEEKEN PHILLIPS

 **Nigel McFadden**
Partner

nigel@mmp.co.nz

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


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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	SOUTHPINE LIMITED.		
Organisation	COMPANY		
Contact Person	TONY WILKINSON		
Postal address	C/- McFadden	Business Phone	5482154
	McWheeler Phillips	Home Phone	—
	P.O. Box 656	Mobile Phone	0274 536 606
Email	NELSON angel@wmp.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

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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.

Southpine Limited
by authorised person

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

12.2.2016
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 type="checkbox"/>	I oppose the above Plan Change Section <input checked="" type="checkbox"/>
Reasons: <i>As attached.</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 type="checkbox"/> Amended as follows <input type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see: <i>Withdraw the change.</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:		

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

Submitter name: *Salpene Kuisel*

**SUBMISSION TO PROPOSED PLAN CHANGE A3
OF THE NELSON AIR QUALITY PLAN**

TO: Nelson City Council
PO Box 645
Nelson

SUBMITTER: Southpine Limited, a duly incorporated company having its registered office at Nelson

ADDRESS FOR SERVICE: The Offices of McFadden McMeeken Phillips
Solicitors
PO Box 656
Nelson 7040
187 Bridge Street
Nelson 7010

SOUTHPINE LIMITED hereby makes a submission in opposition to Plan Change A3 ("the Plan Change).

REASONS FOR OPPOSITION:

1. The Plan Change amends the operative Nelson Air Quality Plan broadly by:
 - Creating a new definition for "*small scale ultra-low emission burning appliances*" (ULEB);
 - A new clause AQR.26A which includes permitted and non-complying rules, assessment criteria and explanatory text in relation to ULEB;
 - Establishes a new Appendix AQ2B setting out the minimum requirements for ULEB including a certification process to be followed in conjunction with the Building Consent process; with
 - Consequential amendments to other operative positions.

2. The structure of the Plan Change is to provide for ultra-low emission burning appliances to be a Permitted Activity (Rule AQR.26A.1) within the urban area in any new building, in any existing building that does not have an operable open fire or small-scale solid fuel burning appliance so long as the appliance:
 - Complies with the requirements of Appendix AQ2B; and
 - Complies with the state requirements in Appendix AQ3; and
 - Burns no fuels in Rule AQR.20 (Prohibited Activities); and

- Is operated so that there is no discharge of excessive smoke (excluding a 15 minute start-up period); and
 - Where any appliances stored in accordance with the rule is successively replaced the replacement small scale ultra-low emitting burning appliance complies with clause (a) of AQR26A.1.
3. Reference to Appendix AQ2B identifies it as being in a number of parts (.1, .2, 3.1, 3.2, 3.3, 3.4) and the Permitted Activity rule requires *“compliance with the requirements of that Appendix (AQR26A.1(ii)(a)(i))*. It is clearly apparent from the structure of the Appendix that a number of discretions are reserved to the Council, for example:
- (i) Reference to *“real life testing conditions”*;
 - (ii) A certification process *“associated with updated monitoring and modelling after 2015”*.

It appears that for Airshed B2 an analysis has been done – enabling only 1,000 ULEBs and in Airshed C an analysis has been done allowing only 600 ULEBs, but in Airshed A (Hospital and Washington Valley) and Airshed B1 (Tahunanui) ULEBs appear to be able to be installed *“based on an examination of the relationship between winter-time PM10 concentrations and meteorological conditions in Nelson”*, including a step 5:

“To assess the ability for additional burner numbers by considering the extent of capacity available, having regard to:

- *the Council’s inventory of certified burners installed (and therefore the number that may still be certified/installed under the current allocation);*
- *the impact of meteorological conditions on concentrations (including Airshed dispersion); and*
- *real life emission factors and fuel use for new small-scale ultra-low emission burning appliance installations”*.

4. It follows that Council could make that assessment and *“open up”* available capacity for additional burners in Airshed A without going through a public process.
5. It is well established that a Council may not reserve to itself a discretion to finally decide whether any activity is *“a Permitted Activity”* (or not) – the question is whether a rule is sufficiently certain to be understandable and functional. In the case of the rule relating to Airshed A and Airshed B1 Council has reserved to itself a discretion to allow for additional burner numbers having regard to certain matters, there is no certainty, the situation is at best *“fluid”* and therefore the rule is ultra vires.
6. Even if the rule was found not to be ultra vires (reliant as it is on a judgment being made on the final two bullet-points of step 5 for Airsheds A and B1) it provides in effect a priority for *“spare capacity”* to ULEBs as distinct (or better put, in preference to) industry already existing in the Zone – thereby constraining the resource.
7. Under the Plan Change Council can allocate capacity to residential users but industry that might want to use some of that *“available capacity”* achieved are shut out.

8. Even if capacity was available, industry must go through a public consent process, but ULEBs get allocated through a "internal process" which is neither public, transparent or open to challenge, thereby giving preference to residential activity over industrial.
9. It seems illogical that the Council should have done a certification process (permitted appliances in Airsheds B2 and C (AQ2B.3.3)) thereby giving certainty, but have not done the same for Airshed B1 and A.
10. It seems the Council has adopted what could be termed a "short cut" process with a priority given to residential users. For Airsheds A and B1 (where the Airsheds are either at or over capacity) all applications for ULEBs should be as for industrial uses WHEREBY either a Non-Complying Activity or Discretionary Activity application is required to go through the public planning process.
11. The Section 32 Analysis (to the extent that it exists at all) is inadequate and the requirements of the Act in that regard are not met.

RELIEF SOUGHT:

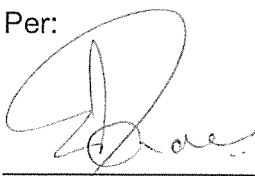
Withdraw the Change.

SOUTHPINE LIMITED

by its solicitor and duly authorised agents:

McFadden McMeeken Phillips

Per:



N A McFadden

Date: 12. 2. 2016

The address for service of the submitter is at the offices of:

McFadden McMeeken Phillips Telephone: (03) 548 2154
Solicitors Facsimile: (03) 548 2157
P O Box 656
Nelson 7040
187 Bridge Street
Nelson 7010

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: 13 FEB 2016
NELSON CITY COUNCIL Customer Service
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	John (Brent) Higgins		
Organisation	private person		
Contact Person	Brent Higgins		
Postal address	9 Atawhau Dr	Business Phone	n/a
	Nelson 7010	Home Phone	548 1934
		Mobile Phone	027 229 3395
Email	jband/sjhg@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.

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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: <i>AQR.26A</i>	Name: <i>Ultra low emission burning appliances.</i>	
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: <i>See attached details</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 type="checkbox"/> Amended as follows <input checked="" type="checkbox"/>		
Where amendments are sought, provide details below of what changes you would like to see: <i>See attached details</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:		

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

Submitter name: *Brent Higgins*

Submission-NAQP Change A3 (woodburners)

Unless changes are made to the proposal, there will be potential for huge and easily avoidable heat loss from free-standing appliances (including ULEB appliances).

The problem is easily mitigated and in the interests of energy conservation and sustainability (goals we should all be striving to meet), I believe changes to the proposed rule is required.

Background

1. Hot flues on free-standing appliances come into close contact with combustible materials as they pass through ceiling spaces to the deliver products of combustion to the outside environment. In order to prevent heat impinging on combustible surfaces, (which would result in a house fire), shielding arrangements which require cooling air are installed to protect the combustible surfaces.
2. A standard shielding arrangement sources its cooling air from inside the room being heated. It takes the hottest air in the room immediately beneath the ceiling, through required gaps in and around the ceiling plate & vents this hot air outside the house.
3. The amount of cooling air required to keep the flue shields cool is significant. The attached report from Applied Research Services Ltd (who test fire appliances amongst other things) quantifies the losses at up to 7.5 lts /sec which equates to 450lts/hr. Expanding on this in a "ballpark" fashion, if an average home burns for 4 hrs on a winters night, this becomes an 1800 lt loss over 4 hrs. Multiply this by 1600 (the minimum number of appliances being proposed) and this becomes a staggering 2,880,000 lts per night of the hottest air in the respective rooms being expelled simply to provide cooling to the flue shielding arrangements.
4. Having personally inspected somewhere in the vicinity of 2000 free-standing appliances during the course of the phased out fire replacements (under the current Air Quality Plan), I would estimate that **85%** of the flue systems were standard flue kits, which allow the above scenario to occur. Even when the fire is not being used, these arrangements continue to act as a passive vent so that heat loss will continue to occur e.g. when the room is being heated by heat pump or electric heater on days when the fire has not been lit.

Solution

The solution is simple. Flue shielding kits that source the cooling air from either the attic space (or outside air-if no attic space exists) should be mandated. In the industry they are known as "Eco" or Heat Saving flue shield systems. There are a number of different manufacturers making them for their own appliances and some generic systems that can be used on any appliance available. The purchase price of Eco/Heatsaving kits are not significantly more expensive than a standard flue kit. It would be hard to quantify how

much wood collectively gets burnt in a night to keep shields cool on standard systems, but it would be a lot. Adopting mandatory use of Eco/Heat saving systems would potentially allow more appliances in the future to be installed simply due to the elimination of this large collective heat loss & associated discharge of particulates.

Amendments sought

1. The preferred amendment is to change Appendix AQ3 (Stack Requirements) if this is possible (It may not be as there has been no advertised change to this appendix) If AQ3 can be changed, then the following addition is requested to AQ3.1
After d) add

e) For free-standing fires, only flue shielding systems that source the cooling air from either the attic space or outside of the building envelope are permitted. Flue shielding systems that source cooling air from inside the room are not permitted.

2. If it is not possible to change AQ3 at this time, then the fall back option requested is to amend AQr26A.1 ii) a by changing

a)iii) For free-standing fires, only flue shielding systems that source the cooling air from either the attic space or outside of the building envelope are permitted. Flue shielding systems that source cooling air from inside the room are not permitted.
And then re-numbering so that the current iii) becomes iv) & current iv) becomes v).

The reason the change to Appendix AQ3 is preferred over the change to the rule is that this important change will apply to all free-standing fires being installed in the future e.g. where NES compliant fires are able to be installed-such as an upgrade in air shed "c". Whereas if done under AQr.26A- it will only apply to ULEB appliances.



J.B.Higgins
Submitter



P.O. Box 687, NELSON,
NEW ZEALAND

PHONE (03) 547 7347
FAX (03) 547 2909
EMAIL: applied@ts.co.nz
WEB: www.appliedresearch.co.nz

Facsimile Cover Sheet

Date: 30th July 2003

Number of Pages: 1

To: DG

Fax Number: 546 0239

Attention: Brent Higgins

Hi Brent

Testing of a typical room vented ceiling penetration system showed that the flow rate of room air passing through the ceiling plate and into the flue liner system was approximately 7.5litres/sec.

There are a lot of factors that influence the effective heat loss this flow represents but assuming the following:

- air enters the liner system at 44°C (at ceiling level) and
- the outdoor air temperature is 4°C

the heat loss will be 0.34kW.

Although this doesn't sound like a lot of heat loss it equates to over a third of the output of a typical one bar electric heater.

We have fully tested three Eco type flue systems to date for Pioneer, Harris Flame Technology and Solid Fuel Products. All utilise similar methods of sealing the ceiling plate against the fluepipe to prevent room air passing into the liner system, and draw their liner cooling air from outside the roof line or from the ceiling space.

Hope this helps

Chris Mildon



Nelson City Council
te kaunihera o whakatū

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

RECEIVED
16 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
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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	Deborah Margaret Baxter		
Organisation	Nil		
Contact Person			
Postal address	1-177 Quebec Rd	Business Phone	035484759.
	Nelson	Home Phone	5469732
		Mobile Phone	0275469732
Email	br@nelsoncollege.school.nz		

Council Hearing

- I/we wish to be heard in support of my/our submission *n/a*
- (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

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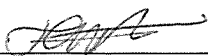
I could could not gain an advantage in trade competition through this submission
If you **could** gain an advantage in trade competition through this submission please complete the following:

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

15/2/16.

Date

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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: When i was notified some years ago that i lived in an airshed that required a new woodburner to replace one we had. It had been put in by me but was still considered not good enough for the required need to help reduce the air pollution. I was a single mum on a very reduced income. I had to put this on my rate of \$5,000. My reason is equity.		
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 am a compliant citizen. I don't want the air quality plan to be reduced to let people get away with something that should have been done years ago. But i do understand the cost of heatpumps new ones could be possibly be allowed to do that. But they have brought the house / or rented knowing this - the air plan should <u>not</u> be allowed to be reduced.		
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: Debbie Baxter

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



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RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040
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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	Pam Colee and Rob Colee		
Organisation			
Contact Person	Pam & Rob Colee		
Postal address	13 B Surrey Road	Business Phone	-
	Richmond	Home Phone	5445 335
		Mobile Phone	027404 6687
Email	colee@kirect.co.nz		

Council Hearing

- ~~I/we~~ ^{do not} 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

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


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(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)

Date 12/2/2016

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: Too many people have older log burners in property missed out on the Warm Homes Scheme or were not aware of it. Warmth required for health reasons or do not want anything that requires power in case of power outages.	
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: Make available to all home owners in the Airshed for Stoke.	

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 checked="" 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: Pam & Rob Cole

Jessica Fechney

From: Submissions
Sent: Monday, 15 February 2016 6:30 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Monday, February 15, 2016 6:29:47 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: ross charles haverfield
 Organisation: home owner
 Contact Person: ross charles haverfield
 Address for Service*: 8 Britannia heights, stepneyville, nelson 7010
 Email*: rosshaverfield@gmail.com
 Phone*: 035484552
 Other Phone:
 Mobile Phone: 0274525523

I/we wish to be heard in support of my/our submission: No (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: No

:
 (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
 Proposed Plan Change provision reference (e.g. AQR.26A): Plan Change A3 Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Woodburner Plan Change

: I support the above Plan Change section

Reasons: I support more use of woodburners. They use renewable fuel and heat homes more thoroughly than other forms of heating eg heat pumps.

The decision I seek from the Council is that this part of the proposed plan Change be:: Retained Where amendments are sought, provide details below of what changes you would like to see::

Additional Submission Points: By way of Council going ahead with these changes they are showing support for more use of woodburners (in a controlled manner) which is a stance that I support and central government should take note of.

Councils should encourage central government to fund research and development of more efficient woodburners on a larger scale than individual councils and producers are able to.

With woodburners being cost efficient, high heat energy producing devices using renewable fuel central governments and councils should be promoting their use and actively encouraging industrial scientists and researchers to invent cleaner burning units.

:

Jessica Fechney

From: Submissions
Sent: Monday, 15 February 2016 7:20 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Monday, February 15, 2016 7:20:09 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: Ruth Thomas
 Organisation:
 Contact Person:
 Address for Service*: 14C Montrose Drive
 Email*: ruthandsteve.nelson@gmail.com
 Phone*: 021 1920 162
 Other Phone:
 Mobile Phone:

I/we wish to be heard in support of my/our submission: No (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: No

(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

Proposed Plan Change provision reference (e.g. AQR.26A): Plan Change A3 Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Woodburner Plan Change

: I support the above Plan Change section

Reasons: I live in a newly built home in Atawhai and would like the opportunity to install a ULEB. Our home is a passive solar design, and in winter time a back up heat source needs to be a radiant heater, so that it can heat the concrete slab.

Therefore, heatpumps are not suitable as they are not radiant heaters. If we are not allowed to install a fire we are only left with the option of an oil column heater.

All of our neighbours have fires and we too would like the opportunity to install a fire to gain that radiant heat for those cold grey days of winter.

In airshed 'C' the smoke from all of the neighbouring fires seems to dissipate in the breeze and I would suggest that adding additional fires into this neighbourhood (especially ultra-low emission burners) would not cause environmental problems and would significantly increase the enjoyment of our home over winter.

Thank you for this opportunity and I look forward to hearing the results of the proposed plan change. The decision I seek from the Council is that this part of the proposed plan Change be: Retained Where amendments are sought, provide details below of what changes you would like to see: :

Additional Submission Points:

:

Jessica Fechney

From: Submissions
Sent: Monday, 15 February 2016 7:39 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Monday, February 15, 2016 7:38:42 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: Dave Loose

Organisation:

Contact Person:

Address for Service*: 782a Atawhai Drive Marybank 7010 Nelson

Email*: harrison127@hotmail.com

Phone*: 0211005487

Other Phone:

Mobile Phone:

I/we wish to be heard in support of my/our submission: No (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: No

:
 (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
 Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A (?) Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): A3 Woodburner Change Plan

: I support in part the above Plan Change Section

Reasons: For too long it has felt like the NCC (like most other councils around NZ) has lumped all woodburners into one 'evil' bag despite the fact that some are clean burning and (comparatively) environmentally friendly. I would like to see provision for the installation and reasonable use of woodburners that are environmentally friendly, with careful monitoring, in appropriately 'ventilated' air sheds.

The decision I seek from the Council is that this part of the proposed plan Change be:: Retained Where amendments are sought, provide details below of what changes you would like to see::

Additional Submission Points:

:

Jessica Fechney

From: Submissions
Sent: Monday, 15 February 2016 7:57 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Monday, February 15, 2016 7:57:22 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: Braydon Blance
 Organisation:
 Contact Person:
 Address for Service*: 24 Towai Street Stoke
 Email*: balance@live.com
 Phone*: 03 547 0622
 Other Phone:
 Mobile Phone: 0224114342

I/we wish to be heard in support of my/our submission: No (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: No

: I could not gain an advantage in trade competition through this submission (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
 :

Proposed Plan Change provision reference (e.g. AQR.26A): Plan Change A3 Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Woodburners

: I support the above Plan Change section

Reasons: Health and a source of heating that doesn't require power or gas in case power outage The decision I seek from the Council is that this part of the proposed plan Change be:: Retained Where amendments are sought, provide details below of what changes you would like to see: :

Additional Submission Points: I think that change should not be limited to a certain number of households. Every household should have the option not first in first served scenario.

Also when we originally bought our property we felt that the amount of time we had to replace our current burner and find the money too fix our current set up too short.

I would like to think we would be able to use our current burner while we await news on when and how we go about replacing our current set up

:

Jessica Fechner

From: Submissions
Sent: Monday, 15 February 2016 10:17 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Monday, February 15, 2016 10:17:05 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: Albert Matthew Field

Organisation:

Contact Person:

Address for Service*: 93 Panorama Drive, Enner Glynn, Nelson

Email*: albertfield@vodafone.co.nz

Phone*: 03 539 0239

Other Phone:

Mobile Phone: 021 1855432

I/we wish to be heard in support of my/our submission: Yes (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: Yes

: I could not gain an advantage in trade competition through this submission (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:

Proposed Plan Change provision reference (e.g. AQR.26A): A3 Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Nelson Air Quality Plan -A3

: I support the above Plan Change section

Reasons: i grew up with a wood burner and you cant get warm sitting around a heat pump The decision I seek from the Council is that this part of the proposed plan Change be: Retained Where amendments are sought, provide details below of what changes you would like to see: heat pumps are no good in winter power outages. everyone should have a wood burner Additional Submission Points:

:

Jessica Fechney

From: Submissions
Sent: Tuesday, 16 February 2016 6:57 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 6:56:58 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: david cogger
 Organisation: land owner
 Contact Person: david
 Address for Service*: 37 mount street,
 Email*: davebenny@xtra.co.nz
 Phone*: 021 191 5634
 Other Phone:
 Mobile Phone:

I/we wish to be heard in support of my/our submission: No (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: No

: I could not gain an advantage in trade competition through this submission (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
 :

Proposed Plan Change provision reference (e.g. AQR.26A): A3 Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):

: I support in part the above Plan Change Section

Reasons: I am a long term resident of Mount Street and live high above the valley floor and have a great view over Nelson.

I believe that the air quality issues could be mitigated with better enforcement/compliance checks as every morning I see that less than 5% of wood burners put out 75% of the smoke emissions that are visible.

If these 5 % of wet wood burners, plastic burners and potentially illegal non-clean air burners were policed then the air quality would increase dramatically.

If you attend open homes in the area you will see that numerous properties have exemptions from the vendors liability that all work completed has a building consent issued - this is due to the fact the NCC has made it too hard, too costly or prohibited the activity. Illegal building work is in some instances common practice.

It is respectfully submitted that illegal or non-compliant woodburners could be a major issue and if the rules remain so strict then illegal installations will increase.

The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows:

Where amendments are sought, provide details below of what changes you would like to see: Clean air approved wood burners be allowed in all air sheds.

Additional Submission Points:

:

Jessica Fechner

From: Submissions
Sent: Tuesday, 16 February 2016 7:01 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 7:01:13 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: Leanne Joy CROSS
 Organisation:
 Contact Person: Leanne
 Address for Service*: 37 Mount Street. Nelson
 Email*: leanne.away@gmail.com
 Phone*: 021374025
 Other Phone:
 Mobile Phone:

I/we wish to be heard in support of my/our submission: No (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: No

: I could not gain an advantage in trade competition through this submission (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
 :

Proposed Plan Change provision reference (e.g. AQR.26A): A3 Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):

: I support in part the above Plan Change Section

Reasons: all air sheds should be allowed ULEB's - The decision I seek from the Council is that this part of the proposed plan Change be: :

Where amendments are sought, provide details below of what changes you would like to see: : all air sheds should be allowed ULEB's - this should be included in the plan or rezone some of the areas as the air zones as they exist do not represent the geographic area well.

Additional Submission Points:

:

Jessica Fechney

From: Submissions
Sent: Tuesday, 16 February 2016 7:11 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 7:10:57 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: Jeanette Aspin
 Organisation:
 Contact Person: Jeanette Aspin
 Address for Service*: 170 Main Road Spring Grove
 RD1 WAKEFIELD
 Email*: jcamnz@yahoo.co.nz
 Phone*: 0274559900
 Other Phone:
 Mobile Phone:

I/we wish to be heard in support of my/our submission: No (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: No

: I could not gain an advantage in trade competition through this submission (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra low emission burning appliance

: I support the above Plan Change section

Reasons: I believe that low emission burning appliances are a very efficeint way to heat a home The decision I seek from the Council is that this part of the proposed plan Change be:: Amended as follows:

Where amendments are sought, provide details below of what changes you would like to see:: Home owners be allowed the choice to install a low emission burning appliance in their home.

Additional Submission Points:

:

From: Administration Support
Sent: Wednesday, 17 February 2016 9:16 a.m.
To: Bev McShea
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Travel Required

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 9:01:41 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners) Auto forwarded by a Rule

Full Name*: Sue Alsop
Organisation: Nelson Asthma Society
Contact Person: Sue Alsop
Address for Service*: Richmond Town Hall
9 Cambridge Street, Richmond 7020
Email*: asthma.nelson@xtra.co.nz
Phone*: 03 5441562
Other Phone:
Mobile Phone: 027 546 7675

I/we wish to be heard in support of my/our submission: No (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: No

: I could not gain an advantage in trade competition through this submission (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:

Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):

: I oppose the above Plan Change Section

Reasons: The Nelson Asthma Society is an advocate for people with asthma and respiratory related conditions and we would be concerned air quality could deteriorate and cause more hospital admissions. The decision I seek from the Council is that this part of the proposed plan Change be.: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see.: That air quality be strictly monitored to ensure air quality is not affected by this planned proposal.

Additional Submission Points:

:

From: Submissions
Sent: Tuesday, 16 February 2016 7:29 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 7:28:42 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Vicky Hawkey
Organisation:
Contact Person: Vicky Hawkey
Address for Service*: 1/12 Paremata Street, Atawhai, Nelson, 7010
Email*: vicky.hawkey1@gmail.com
Phone*: 035451360
Other Phone:
Mobile Phone: 0274226244

I/we wish to be heard in support of my/our submission: Yes
(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: No

:
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): woodburner change in plan
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Low emission approved woodburners can be installed. NOT pellet fires though being the only option.

: I support the above Plan Change section
Reasons: I would like to install a free standing/or built in woodburner with wetback, into my property. The decision I seek from the Council is that this part of the proposed plan Change be.: Retained
Where amendments are sought, provide details below of what changes you would like to see.:
Additional Submission Points:
:

From: Submissions
Sent: Tuesday, 16 February 2016 8:46 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 8:45:45 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Alistair Rollinson
Organisation:
Contact Person:
Address for Service*: 28 Woodstock Place, Stoke
Email*: al.kel@littlereds.co.nz
Phone*: 035474789
Other Phone: 035474789
Mobile Phone: 021 847 337

I/we wish to be heard in support of my/our submission: Yes
(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: No

:
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances

: I support in part the above Plan Change Section

Reasons: Yes, I agree ULEB should be added to this plan, however I also believe NES wood burners should also be added to this plan change in areas that are categorised as "acceptable" ie B2 airshed. I believe this because ULEBs are still very limited, they generally heat only small homes/areas (ie under 150m2), they also need constant refuelling which makes them very impractical versus the cost of them. NES wood burners will heat homes up to 280m2 and require less frequent refuelling. Some NES woodburners, when loaded correctly can also burn through the night.

The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see: Please add NES burners into this rule change for areas categorised as "acceptable or higher" air quality

Additional Submission Points:

:

From: Submissions
Sent: Tuesday, 16 February 2016 10:35 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 10:35:23 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Emma McCashin
Organisation:
Contact Person:
Address for Service*: 255A Nayland Rd, Stoke, Nelson 7011
Email*: emma@mccashins.co.nz
Phone*: 021682787
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances

: I support the above Plan Change section
Reasons: Because there is a need for low cost heating options.
The decision I seek from the Council is that this part of the proposed plan Change be.: Retained
Where amendments are sought, provide details below of what changes you would like to see.:
Additional Submission Points: We have not completed the Woodburner Survey for Property owners as we do not wish to install one in the next two years, however we think the lower cost model (NES Woodburner) would be the preferable option as a \$2000 purchase cost + installation is obtainable for most people (whereas \$5000-\$8000 isn't so doesn't help solve any heating issues particularly for the elderly and low income earners).

From: Submissions
Sent: Tuesday, 16 February 2016 11:31 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Tuesday, February 16, 2016 11:31:26 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Jill Harris
Organisation:
Contact Person: Jill Harris
Address for Service*: 36c Victoria Heights, Nelson
Email*: writebyjill@gmail.com
Phone*: 035469398
Other Phone:
Mobile Phone: 0292746030

I/we wish to be heard in support of my/our submission: No
(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: No

: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances (Urban Area) new buildings, or existing buildings Amend the wording in AQR.21.b.ii)

: I support the above Plan Change section
Reasons: With continuing advancements in low emission technology, it makes sense to be more flexible. Allowing woodburners give people access to warmth which can be free or low cost. Having a woodburner has a positive affect on wellbeing, by creating a "cheerful" atmosphere, unattainable through other heating methods. From a civil emergency perspective, access to heat that is not electricity or gas dependent is also sensible.

The decision I seek from the Council is that this part of the proposed plan Change be.: Retained
Where amendments are sought, provide details below of what changes you would like to see.:

Additional Submission Points:

:

From: Submissions
Sent: Wednesday, 17 February 2016 9:09 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 9:08:34 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: franciscus jan rooth
Organisation:
Contact Person: john
Address for Service*: 18 parere st
Email*: roothjohn@gmail.com
Phone*: 02102828392
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No

:
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): 26a
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): ultra low emission burner appliances

: I support the above Plan Change section

Reasons: use of clean air burner

The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see: use of clean air burner

Additional Submission Points: have no form of heating, only open fire which is not in use

:

From: Submissions
Sent: Wednesday, 17 February 2016 9:13 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 9:13:04 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Sam Gavin
Organisation: -
Contact Person: -
Address for Service*: 18 Harley St, Nelson 7010
Email*: samgavin.nz@gmail.com
Phone*: 0274413456
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low Emission burning Appliances

: I support in part the above Plan Change Section
Reasons: I have raised a child in 2 cold drafty Nelson houses that were built around the turn of the century and in both cases it has been very cold in winter despite installation of a heat-pump and insulation where feasible. The effect on my child's health from the cold has been bad. Therefore I support the plan change to allow wood burners.

The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see: I would like clarity about how the 1600ULEB (or 350NES burners) will be allocated, and would suggest that older colder houses with higher studs and sash window with the wind be given preference or be allowed bigger NES burners. I would prefer to install a burner to the NES standard rather than the ULEB standard for reasons of cost and capacity. Only the NES burners come with a wetback and the max 15kW capacity of the ULEBs is insufficient for the size of our house (180m2), only a NES (max of around 24kW) will put out enough heat for this type of older construction.

Additional Submission Points: Good on you for tackling this important issue.

:

Submission on Proposed Plan Change A3 (Woodburners)

Inga Schmidt
19 Douglas Road
Wakatu
Nelson 7011

RECEIVED

16 FEB 2016

NELSON CITY COUNCIL
Customer Service

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

The air quality is poor in the colder months of the year where we are living. We cannot open the windows to get fresh air and being outside is very unpleasant, especially at the time when people are lighting their fires.

The biggest problem is likely what is being burned (wood that is not entirely dry, treated wood, certain colourful paper, rubbish, etc.). Having warm and dry houses is obviously important, but so is fresh, non-toxic air.

1. Could it be controlled what gets burned?
2. What steps would be implemented if more wood burners are allowed and the air quality goes down? Could you change it back to how it was and if yes how?
3. How would households be affected that have received a heat pump and insulation in exchange for not having a wood burner? If these households installed a wood burner again what incentive would you have for them to uninstall a wood burner if the air quality went down?
4. If I rang you, would you send out a person at the time when fires are lit and find out with household produces the smelling smoke and stop that? At this stage I cannot see how this could be implemented, however that would make a difference.

My main concern is what gets burned. You have encouraged and educated people on what to burn, which I have seen in the newspaper and on billboards. These are useful steps; however this has not made a difference for us.

I am doubtful that the air quality will improve for us in the next winter with the wood burner situation as it is. Having more wood burners might only compound this issue.

I fully understand that people prefer the heat from a fireplace over that of a heat pump and that people want to make use of fire wood if they happen to have easy access to it. On the other hand clean air is essential to our health and quality of life. **Therefore I would like the questions above answered before more wood burners are allowed. Furthermore I would love to see my individual air quality situation improve regardless of the wider issue.**

P.S. On another note dehumidifiers are maybe overlooked in the process of creating healthier, dryer and warmer homes. Good quality dehumidifiers can be very beneficial in damp houses to avoid mould and might help in reducing heating costs.

Submission Form: Nelson Air Quality Plan Plan Change A3 (Wood Burners)



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:
16 FEB 2016
NELSON CITY COUNCIL
RAD No:
Customer Service

on Proposed Plan Change/Variation A3 Wood Burners
(Number) (Name)

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

Submitter Details

Full Name	Linda May Cunningham		
Organisation			
Contact Person			
Postal address	27 Stafford Avenue	Business Phone	
	Annesbrook	Home Phone	
		Mobile Phone	0211007027
Email	Lin-c@eds.net.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.

L.M. Cunningham

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

16/2/16.

Date

Submission Point 1

Proposed Plan Change provision reference or planning map number e.g. A2-13	Proposed Plan Change provision name e.g. Meanings of words
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: We have a strong preference for wood burners as we have had this form of heating in previous homes. We have in the past installed Heat pumps but find they are not such a nice heat to that of a wood burner	
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 or planning map number e.g. A2-13	Proposed Plan Change provision name e.g. Meanings of words
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: Linda Cunningham

From: Submissions
Sent: Wednesday, 17 February 2016 9:44 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)
Attachments: Submission-on-NCC-Nelson-Air-Quality-Plan-Proposed-Plan-Change-A3-Wood-Burners.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 9:43:57 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Peter Burton and Ed Kiddle
Organisation: Nelson Marlborough District Health Board Public Health Service
Contact Person: Angela Lenz
Address for Service*: 281 Queen Street Richmond 7020
Email*: angela.lenz@nmdhb.govt.nz
Phone*: 543 7805
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: Yes
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances/methodology for determining future provision for ULEBs
: I support in part the above Plan Change Section
Reasons: Please see attached submission
The decision I seek from the Council is that this part of the proposed plan Change be.: Amended as follows:
Where amendments are sought, provide details below of what changes you would like to see.: Please see attached submission
Additional Submission Points: Please see attached submission
:



Nelson Marlborough
District Health Board

**Submission on Nelson City Council
Nelson Air Quality Plan
Proposed Plan Change A3: Wood
Burners**

17 February 2016

For more information please contact:

Angela Lenz

NMDHB Public Health Service

Email: angela.lenz@nmdhb.govt.nz

Phone: (03) 543 7805

Introduction

1. Nelson Marlborough District Health Board (NMDHB) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMDHB's Public Health Service (NMDHB-PHS) appreciates the opportunity to comment from a public health perspective on the Nelson City Council (NCC) Nelson Air Quality Plan Proposed Plan Change A3 (the 'Wood Burner Plan Change').
2. The NMDHB-PHS makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. The NMDHB-PHS considers that air quality is a key determinant of health and wellbeing. There are a number of health issues associated with poor air quality. For example, exposure to air pollution from open fires and wood burners is associated with increased respiratory symptoms such as coughing and wheezing, increased winter hospital admissions for respiratory and cardiovascular illnesses, and reduced life expectancy.¹ The pollutants of primary concern are particulates PM₁₀ and PM_{2.5}. These particles cause health effects, especially over the long term. There is a substantial body of evidence on the health effects of inhaling particulate matter with the smaller PM_{2.5} particles being more significant due to their ability to penetrate deeper into the lungs.¹
4. This submission sets out specific matters of interest or concern to the NMDHB-PHS including around the provision for ultra low emission burners (ULEBs) in specific areas, the behaviour change and monitoring programme, the future provision for additional ULEBs and cold homes.
5. The NMDHB-PHS would also like to take this opportunity to acknowledge the comprehensive manner in which NCC has considered the matters of air quality and wood burners, including through commissioning a number of independent studies, and the amount of work involved.

Provision for Ultra Low Emission Burners in Airsheds B2 and C

6. The NMDHB-PHS **supports** the proposed new rule AQr.26A allowing a specified number of ULEBs in certain areas. It is noted that these appliances will only be permitted in Airsheds B2 (Stoke) and C (Brook to Atawhai) where research undertaken by Environet Ltd indicates that there will be no degradation in air quality and a continuation of projected downward trends can be achieved. This outcome is subject to an enhanced behaviour change programme targeting a 10% reduction in PM₁₀ being implemented concurrently (discussed below).
7. In terms of the remaining areas of the city - Airsheds A (Victory) and B1 (Tahunanui) - research undertaken by Environet Ltd indicates that there is currently no capacity for the installation of

¹ Kuschel G, Metcalfe J, Wilton E, Guria J, Hales S, Rolfe K, Woodward A. 2012. *Updated health and air pollution in New Zealand study*. Volume 1: Summary report. Prepared for Health Research Council of New Zealand, Ministry of Transport, Ministry for the Environment and New Zealand Transport Agency.

ULEBs in these airsheds given their poorer winter air quality. The NMDHB-PHS **supports** the proposed rule not permitting additional ULEBs in these airsheds.

Decision sought

8. That new rule AQR.26A permitting a specific number of ULEBs in Airsheds B2 and C is made operative.
9. That the intent of new rule AQR.26A remains as written in that ULEBs are not permitted in Airsheds A and B1.

Behaviour change and monitoring programme

10. The implementation and success of the behaviour change programme is integral to the anticipated air quality results being achieved alongside the introduction of ULEBs under new rule AQR.26A. Accordingly, the NMDHB-PHS considers that it is important that the behaviour change and monitoring programme is amended to detail how the programme itself will be routinely monitored, evaluated and reviewed to ensure that it achieves at least a 10% reduction in PM₁₀, and also to detail the ongoing operational costs for implementing the programme over the life of the Nelson Air Quality Plan (further to the initial set-up costs already set out in the programme). It is also important that NCC commits long-term funding to the behaviour change programme to ensure its continuation.
11. Although the behaviour change programme targets reducing PM₁₀, the NMDHB-PHS supports the continuation of PM_{2.5} monitoring and considers that it should also be incorporated into the behaviour change monitoring programme to better inform the evaluation of the programme parallel to new rule AQR.26A. As the Nelson Air Quality Plan identifies, it is estimated that 90% of Nelson's PM₁₀ fits into the PM_{2.5} category due to the high use of wood and that these particles can cause serious health effects.

Decision sought

12. That the behaviour change and monitoring programme sets out how the programme itself will be routinely monitored, evaluated and reviewed to ensure that a 10% reduction in PM₁₀ is achieved as a minimum.
13. That the behaviour change and monitoring programme sets out the ongoing operational costs of implementing the programme over the life of the (reviewed) Nelson Air Quality Plan, and that NCC commits long-term funding to ensure the programme's continuation.
14. That the behaviour change and monitoring programme incorporates PM_{2.5} monitoring to better inform the evaluation of the programme parallel to new rule AQR.26A.

Future provision for additional Ultra Low Emission Burners

15. The Wood Burner Plan Change provides mechanisms to facilitate the introduction of additional ULEBs for the event that air quality initiatives improve the Urban Area's ambient air quality to a level where it is considered additional ULEBs can be enabled (including the possibility of Airsheds A and B1).
16. The NMDHB-PHS **supports this provision in part** and encourages the NCC to be cautious in considering the "capacity" of an airshed in accommodating increased numbers of ULEBs. The NMDHB-PHS notes that Nelson city has made very good progress in decreasing winter air pollution which primarily arises from the use of wood burners and it is important that this progress is not compromised.
17. The NMDHB-PHS strongly believes that the National Environmental Standard (NES) for PM₁₀ should not be seen as a level to which can be polluted up to. In support of this:
 - Policies of the Nelson Air Quality Plan aim to improve ambient air quality
 - The World Health Organization states that the health effects of PM₁₀ and PM_{2.5} are well documented and that there is no safe level of exposure to which no adverse health effects occur²
 - Environet Ltd, in its report prepared for the NCC³, states that "allowing the degradation of air quality, particularly polluting up to a guideline or standard, is inconsistent with the nationwide philosophy for air quality planning which typically promotes the maintenance or enhancement of existing air quality".
18. To this end, the NMDHB-PHS considers that the methodology for determining any future capacity as set out in proposed Appendix AQ2B.3.4 should be amended. Currently the overall aims for Airsheds A and B1, where air quality is poorer, are geared towards ensuring that PM₁₀ concentrations fall below NES requirements in evaluating the extent to which there may be capacity for new installations of ULEBs.
19. The NMDHB-PHS considers that the proposed criteria for determining whether additional ULEBs can be accommodated needs to ensure an environmental outcome consistent with Environet Ltd's findings that support the installation of ULEBs in Airsheds B2 and C under the Wood Burner Plan Change. Namely, that there will be no degradation in air quality and a continuation of projected downward trends can be achieved. The NMDHB-PHS believes that this approach will result in better environmental and health outcomes, and give better effect to the policy aims of the Nelson Air Quality Plan for improving ambient air quality.

² World Health Organization. 2013. *Health effects of particulate matter: Policy implications for countries in eastern Europe, Caucasus and central Asia*. Copenhagen: WHO Regional Office for Europe

³ Wilton E. 2015. *Air quality management in Nelson – Modelling of additional scenarios – 2015*. Prepared for the Nelson City Council. Christchurch: Environet Ltd

Decision sought

20. That the criteria for determining future capacity for additional ULEBs under proposed Appendix AQ2B.3.4 is amended to ensure an environmental outcome whereby there will be no degradation in air quality and a continuation of projected downward trends can be achieved.

Cold homes

21. The NMDHB-PHS notes that Airsheds A and B1 which have poorer winter air quality also contain some of Nelson's most socially deprived areas.⁴ The NMDHB-PHS is also aware that a greater proportion of the cities' cold homes are located within these areas.
22. The NMDHB-PHS considers it unlikely that the Wood Burner Plan Change will have an impact on addressing cold homes in Airsheds A and B1. Further to poor air quality currently restricting the installation of ULEBs in these areas, the cost of ULEBs is also likely to be prohibitive to many of these households if they were allowed in the future (either directly as owner-occupiers or indirectly due to landlords being unwilling to pay for their installation).
23. The NMDHB-PHS acknowledges that cold homes also have health effects and believes that it is important that this issue is addressed alongside improving air quality. However, good air quality should not be compromised at the expense of heating cold houses and therefore other initiatives, such as improving thermal efficiency of homes, are important.
24. The NMDHB-PHS is pleased to note that the study by Environet Ltd found substantial gains have been made in improving the insulation levels of Nelson homes and that it is unlikely that there has been an increase in cold homes since high emission wood burners were phased out. The NMDHB-PHS would like to acknowledge NCC's contribution in funding to support the Warmer Healthier Homes programme for insulation upgrades to Nelson residents in most need.
25. The NMDHB-PHS considers that it is very important that NCC continues to support initiatives to address cold homes and associated health effects alongside improving air pollution.

Decision sought

26. That NCC continues to support the Warmer Healthier Homes programme and/or other initiatives aimed at improving thermal efficiency and home heating.

⁴ University of Otago. *Socioeconomic deprivation indexes: NZDep and NZiDep*, Department of Public Health. <http://www.otago.ac.nz/wellington/departments/publichealth/research/hirp/otago020194.html>

Conclusion

27. The NMDHB-PHS thanks the NCC for the opportunity to comment on the Wood Burner Plan Change.
28. The NMDHB-PHS supports the overall intent of rule AQR.26A but considers that amendments to the supporting criteria for enabling additional ULEBs and the behaviour change programme are needed to ensure better environmental and health outcomes.
29. The NMDHB-PHS sees it very important to continue to work in partnership with the NCC on air quality matters. Of note, the NMDHB is currently developing a position statement on the interrelated issues of warm homes and air quality and looks forward to presenting it to NCC and other local authorities in due course.
30. The NMDHB-PHS **wishes to be heard** in support of its submission.

Yours sincerely



Peter Burton
Service Manager
Public Health, Rural Health
and District Nursing
peter.burton@nmhs.govt.nz



Dr Ed Kiddle
Medical Officer of Health
ed.kiddle@nmhs.govt.nz

From: Submissions
Sent: Wednesday, 17 February 2016 11:56 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)
Attachments: Environment-Canterbury-Proposed-Canterbury-Air-Regional-Plan-Schedule-8-Space-heating-appliance-auditing-process.htm

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

 From: Council Enquiries (Enquiry)
 Sent: Wednesday, February 17, 2016 11:55:50 AM
 To: Submissions
 Subject: Submission on Proposed Plan Change A3 (Woodburners)
 Auto forwarded by a Rule

Full Name*: Rene Haeberli
 Organisation: EnviroSolve Ltd
 Contact Person: Rene Haeberli
 Address for Service*: 133 Ohakune Road, RD 3, Wanganui
 Email*: rene.haeberli@xtra.co.nz
 Phone*: 06 385 4871
 Other Phone:
 Mobile Phone: 021 24 24 211

I/we wish to be heard in support of my/our submission: Yes
 (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: Yes
 : I could gain an advantage in trade competition through this submission
 (If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: Yes
 :
 :

Proposed Plan Change provision reference (e.g. AQR.26A): Ultra low emission burner with fully automatically operated down draft (no manuals) or other fully automatic ultra low emission burning appliances.
 Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): The Ultra-low emission burner appliances has to be limited to: Ultra low emission burner with fully automatically operated down draft (no manuals) or other fully automatic ultra low emission burning appliances.

: I support in part the above Plan Change Section
 Reasons: The ULEB must be capable to operate the Down Draft fully automatically without an manual interaction of human beings. Manual down drafts to not pay attention to the fact of human error so the emission will be dramtically increased (especiially) in the start-up phase or in the end phase (putting the down draft to right time and temperature in and out. Ecan authorized three manual down draft burners despite the fact that the put regulation into place regarding tampering of the fire. Please see below and attached.

Please read the the following points under Schedule 8 of the Proposed Canterburu Air Regional Plan (Schedule 8 is also attached).
 Schedule 8: Space heating appliance auditing process

Audit schedule for ultra-low emitting enclosed burners: information required to demonstrate that a burner achieves the required standards.
 Enclosed burner design
 The enclosed burner must be designed to achieve the efficiency and emissions standards when operated by a person in their own home. This means:

1. The burner cannot be operated in such a way as to bypass the technology that results in ultra-low emissions; and
2. The burner cannot be reasonably tampered with in such a way as to affect its performance - this means that it is unable to be tampered with using hand tools available in a home such as screwdrivers, spanners and files; and
3. The burner is designed to perform to achieve the emissions and efficiency standard when operated by a person in their own home

The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see: The ULEB must be capable to operate the Down Draft fully automatically without any manual interaction of human beings.

Additional Submission Points: Additional point to Interpretation and a) Question: How can the Nelson City Council guarantee that the specific application will operate within the emission and efficiency, when the Down Draft has to be put in manually. It is total out of the council's control if people put their manual Down Draft in at the manufacturer's recommendation. They can put them in too early or too late because they are distracted by phone, cooking etc or simply can not be bothered anymore after a while because they have now a fire, nobody can police it and the purpose of the goal reducing emission can not be achieved due to the errors or unwillingness to care of the human beings. Therefore only fully automatic Down Drafts are the future because then we can take the errors of the human beings out.

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- [12 Proposed Canterbury Air Regional Plan General Map Series](#)
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Schedule 8: Space heating appliance auditing process

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Audit schedule for low emitting enclosed burners: information required to demonstrate that a burner achieves the required standards.

National regulations

The appliance must meet any regulations specific to enclosed burners in any relevant Regulations. At the time of publication these regulations are set out in the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.

Test method

The low emitting enclosed burner must be tested to demonstrate that it achieves the emissions and efficiency standards using a test method consistent with the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.

Test laboratory or practitioner accreditation

The testing must be undertaken by an independent laboratory or practitioner accredited by an accreditation authority to carry out the tests involved.

Burner identification

Information needs to be supplied to the testing laboratory or test practitioner, and subsequently to the CRC with the test report, to uniquely identify the burner unit tested and define all of those parameters that may affect the performance of the enclosed burner, including dimensioned assembly drawings with specification of major components.

Information to be provided to the Canterbury Regional Council

A copy of the following documentation must be provided to the CRC:

1. Test report for emissions and efficiency; and
2. Design drawings and detailed description of the enclosed burner (and water booster if fitted) including part identification numbers which match the specifications of the test model to the production model; and
3. Dimensioned assembly drawings with specification of major components; and
4. Sales brochure (if available); and
5. Manufacturer's installation and operating instructions; and
6. Proposed authorisation label.

Technical audit and report

On receipt of the above information, CRC will certify a burner as meeting the appropriate standards for a low emitting enclosed burner if the following criteria are met.

1. A representative example of the enclosed burner is made available for inspection; and
2. The enclosed burner achieves the emissions and efficiency requirements of the Air Plan and the Resource Management (National Environmental Standards for Air Quality) 2004; and
3. The enclosed burner achieves the enclosed burner design criteria specified above; and
4. The summary results in the test report accurately reflect the results recorded in the test runs raw data; and
5. The dimensional information and description provided in the test report is consistent with that shown on the drawings; and
6. The representative enclosed burner is consistent with both the drawings and what was tested.

Five yearly audit

The enclosed burner will be subject to a physical audit of a production model not less than once every five years to determine whether the unit is consistent with the drawings supplied and what was tested for.

Audit schedule for ultra-low emitting enclosed burners: information required to demonstrate that a burner achieves the required standards.

Enclosed burner design

The enclosed burner must be designed to achieve the efficiency and emissions standards when operated by a person in their own home. This means:

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

2. The burner cannot be reasonably tampered with in such a way as to affect its performance - this means that it is unable to be tampered with using hand tools available in a home such as screwdrivers, spanners and files; and
3. The burner is designed to perform to achieve the emissions and efficiency standard when operated by a person in their own home; and
4. If maintenance such as cleaning or filter changing is required for the technology to be effective in achieving the emissions and efficiency standard there must be a process in place to ensure this happens; and
5. The technology for reducing PM₁₀ emissions must be designed to be effective for the duration of the enclosed burner's life.

National regulations

The enclosed burner must meet the minimum requirements of any regulations specific to enclosed burners in any relevant national standards. At the time of publication these regulations are set out in the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.

Test method

To be considered to meet the definition of an ultra low emitting enclosed burner, devices must be tested to simulated real life conditions. This is a test that is more stringent than the minimum requirements of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.

Test operating regime

The enclosed burner is to be tested over the normal operating regime of the enclosed burner and operated over a range of output settings: i.e. at maximum and minimum outputs. Results at nominal (maximum) output setting would not be accepted unless the enclosed burner can be operated only at this output setting.

The testing must involve a minimum of two tests that include start-up, a period of operation at maximum heat output, and a period of operation at minimum heat output reflecting the normal operating conditions for the enclosed burner.

To be valid, results from each test period phase (high and low output) must be within 10% of the mean value of the tests for this corresponding phase.

Fuel

For log burners, the enclosed burner is to be tested using commercially available wood, including knots and bark, and including test phases for softwood, hardwood and partially seasoned softwood.

For other types of burners that can only operate on a specified fuel, the enclosed burner must be tested using the specified fuel for the appliance - for example, this applies to pellet fires.

Efficiency determination

The efficiency may be determined by either a calorimeter room method or a stack loss method.

The efficiency must be converted to gross calorific basis.

The average efficiency must be calculated for the full range of test runs as per the test operating regime above.

The results need to be averaged.

Particulate measurement

The measurement of particulates must be by a method that determines all those particulates that will form when the discharge is cooled to not more than 32°C. This includes filterable particulates plus condensables.

In some cases, tests that do not necessarily measure all particulates that would be collected from a dilution tunnel method with filters at 32°C can be considered with an appropriate scaling that takes this into consideration.

Test laboratory or practitioner accreditation

The testing must be undertaken by an independent laboratory or practitioner holding applicable accreditation.

Burner identification

Information needs to be supplied to the testing laboratory or test practitioner, and subsequently to the CRC with the test report, to uniquely identify the burner unit tested and define all of those parameters that may affect the performance of the enclosed burner, including dimensioned assembly drawings with specification of major components.

Information to be provided to the Canterbury Regional Council

A copy of the following documentation must be provided to the CRC:

1. Test report for emissions and efficiency; and
2. Design drawings and detailed description of the enclosed burner (and water booster if fitted) including part identification numbers which match the specifications of the test model to the production model; and
3. Dimensioned assembly drawings with specification of major components; and
4. Sales brochure (if available); and
5. Manufacturers installation and operating instructions; and
6. Proposed authorisation label.

Technical audit and report

On receipt of the above information, CRC will certify a burner as meeting the appropriate standards for a low emitting enclosed burner if the following criteria are met.

1. A representative example of the enclosed burner is made available for inspection; and
2. The enclosed burner achieves the emissions and efficiency requirements of the Air Plan and the Resource Management (National Environmental Standards for Air Quality) 2004; and
3. The enclosed burner achieves the enclosed burner design criteria specified above; and
4. The summary results in the test report accurately reflect the results recorded in the test runs raw data; and
5. The dimensional information and description provided in the test report is consistent with that shown on the drawings; and
6. The representative enclosed burner is consistent with both the drawings and what was tested.

Five yearly audit

The enclosed burner will be subject to a physical audit of a production model not less than once every five years to determine whether the unit is consistent with the drawings supplied and what was tested for.

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P.O. BOX 687, NELSON,
NEW ZEALAND

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WEB: www.appliedresearch.co.nz

Improper Use of Ultra Low Emissions Downdraught Heater

**Customer: Environment Canterbury
PO Box 345
CHRISTCHURCH 8140**



P.O. Box 687, NELSON,
NEW ZEALAND

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Report 15/2797

December 22nd, 2015

Page 1/6

Customer: Environment Canterbury
PO Box 345
CHRISTCHURCH 8140

P1900/10

Attention: Don Chittock

Improper Use of Ultra Low Emissions Downdraught Heater

1.0 Introduction

Flue gas emissions of a sample of the appliance described below were tested in conjunction with a measurement of power output and efficiency using the methods set out in Canterbury Method 1 (CM-1), revision 1.5. The bypass damper was intentionally left open for this test.

Testing was conducted using the calorimeter room and dilution tunnel arrangement specified in AS/NZS 4012 and 4013.

Appliance	Duo
Manufacturer	Tropicair Heating Ltd
Type of Appliance	Freestanding Downdraught Wood Burner
Test Personnel	T. Glen, W.S. Webley
Location of Tests	Beatty Street, Nelson Laboratory
Month of Testing	December 2015

1.1 Accreditation



This laboratory is accredited by International Accreditation New Zealand (IANZ). The tests reported herein have been performed in accordance with the terms of our accreditation. This accreditation does not extend to any opinions or any interpretations of test results contained in this report. Laboratory Registration Number 395.

IANZ is recognised at international level by ILAC. This means that an IANZ endorsed test report or certificate is also recognised by other signatories to the ILAC MRA such as NATA.

Figure 1 Photograph of the Heater as Tested



2.0 Details of the Heater

The heater was a downdraught design having an upper and lower chamber for combustion. Fuel was loaded in the upper chamber only. A manually operated bypass damper was fitted above the upper chamber. The damper allowed flue gases to pass upwards into the flue from the upper chamber. In normal usage the damper is open at start up and closed after about 20 minutes remaining closed for the rest of the burn. When closed the flue gases are drawn through the floor of the upper chamber and combustion continues in the lower chamber. For this test the damper remained fully open at all times.

The upper and lower chambers were separated by the lower baffle i.e. the top of the baffle was the floor of the upper chamber. The heater was tested on a storage base plinth.

3.0 Test Procedures

Tests were carried out using the procedure specified for Day 1 of Canterbury Method 1 Appendix 1 Revision 1.5 in which partially seasoned fuel is used in the final phase of the day.

Canterbury Method 1 uses the equipment and some of the procedures specified in the joint Australian/New Zealand Standards 4012:2014 and 4013:2014.

The firing regime in this testing was the same as used for earlier testing of the heater to CM-1 and reported in ARS report 15/2783. For the testing reported here and the earlier testing the following modifications were made to Canterbury Method 1:

1. Ash and charcoal were removed from firebox (upper chamber) before start-up phase.
2. Approximately 5 mm thick layer of ash was placed in the downdraught (lower) chamber.
3. Kindling arranged in crisscross pattern with three firelighters placed at base of kindling.
4. Intermediate Load 1 load point indicated by flue temperature peaking.
5. Intermediate Load 2 and the Start-up Phase end point were marked by the fuel load reaching 28% of the fuel load mass indicated in CM-1 instead of 50% and 45% respectively.
6. High burn and Low burn Phase reload and end points occurred when the main loads were fully consumed i.e. start ember bed weight was reached, instead of 50 and 45% of the mass of the main load as indicated in CM-1.
7. Note on Fuelling; CM-1 fuel size and weight was used in testing with alteration to the reload and end of phase weights only. This was because the volume of fuel left at the CM-1 specified points was too much for the fresh fuel to fit in the firebox.

For testing improper use of the heater the flue damper was left fully open throughout the test. In previous testing the damper was closed during the start-up phase and remained closed for the remainder of the test.

3.1 Details of Test Runs

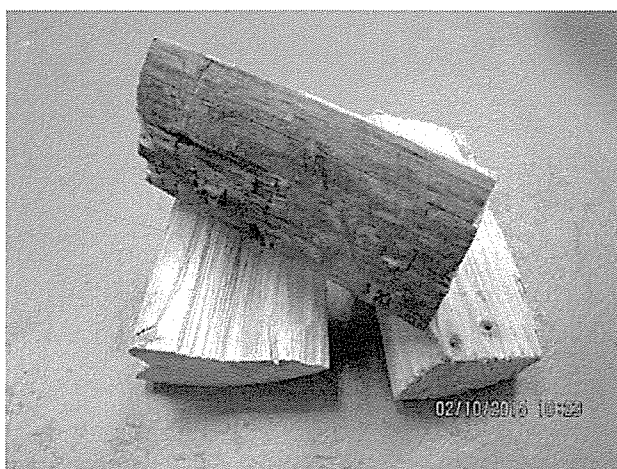
Test fuel loads were prepared in accordance with CM-1. Details of the fuel load are given in Table 1. The test pieces were loaded in accordance with CM-1. A photograph of a typical test load is shown in Figure 2.

Table 1 Firebox and Fuel Data

The dimensions used in this Table are not intended for design verification purposes and may therefore differ from dimensions given in the heater description.

Dimension of firebox used to calculate fuel load (mm)	422 side to side
Theoretical length of fuel pieces (mm)	250
Fuel species	<i>Pinus radiata</i>
Gross calorific value of fuel (MJ/kg) (This analysis was subcontracted to another laboratory)	20.1

Figure 2 Typical Test Fuel Load



4.0 Results

A summary of the data obtained from these tests is given in Appendix 1. During the tests with the damper open we noted there was still some combustion in the lower chamber at times during the start-up and high burn phases but that none was apparent during the low and partially seasoned phases. Compared to tests with the damper closed, the particulate emission rates increased and the efficiency decreased.

The results of this test relate only to the installation, fuel and operating procedures detailed in this report. Tests under other conditions are likely to give different results.

4.1 Efficiency

Overall efficiencies for each day are:

	Normal Use	Improper Use
Overall Efficiency (%)	73	49

4.2 Particulate Emissions

Overall emissions for the tests are given below. Results for emissions for each phase are detailed in Appendix 1.



	Normal Use	Improper Use
Average Particulate Emissions Rate (g/kg)	0.35	1.71
Average Particulate Emissions Rate (mg/MJ)	24	171

4.3 Uncertainty

Our report 13/2635 examines the uncertainties associated with the CM-1 method.

This Report:

This report relates only to the product sample tested. Any modifications to the product may invalidate the compliance results.

Report: 15/2797	
Prepared by: G. Looman	
Approved by: W.S. Webley	
Release Date:	23-12-15

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Appendix 1 Summary of Data from Test Runs**Individual Phase Run Condition Data****Bypass Damper Being Used Correctly**

DAY 1 1/10/2015	Bed weight immediately before loading kg	Fuel Load kg	MC %ww	Flue Temp Immediately before loading °C	Average Flue temp °C	Fuel burnt kg Fuel load + ember bed weight difference	Burn Time min	Average burn rate kg/h
Start-up Phase kindling	0.000	1.026	17.0	17	219			
Int 1	0.292	1.211	18.0	322				
Int2	0.599	2.531	19.3	171		4.075	53.07	4.61
High Burn Rate M1	0.693	3.098	17.9	248	281			
M2	0.699	3.092	17.5	273		6.197	97.62	3.81
Low Burn Rate M3	0.686	3.114	18.0	277	261			
M4	0.716	3.050	17.4	245		6.162	123.00	3.01
Partially Seasoned M5	0.688	3.102	29.0	242	251			
Turn down	2.991			265				
Sampling End	1.645					2.145	40.28	3.19
Cooldown					71	1.540	559.17	0.15
Charcoal residue	0.1052					Total time	873.13	

Improper Use of Bypass Damper

DAY 1 15/12/2015	Bed weight immediately before loading kg	Fuel Load kg	MC %ww	Flue Temp Immediately before loading °C	Average Flue temp °C	Fuel burnt kg Fuel load + ember bed weight difference	Burn Time min	Average burn rate kg/h
Start-up Phase kindling	0.000	1.002	17.0	21	340			
Int 1	0.258	1.211	16.6	353				
Int2	0.605	2.473	17.3	341		4.019	55.73	4.33
High Burn Phase								
M1	0.667	2.926	16.8	366	434			
M2	0.676	3.018	17.3	356		5.959	102.25	3.50
Low Burn Phase								
M3	0.652	2.963	16.8	350	362			
M4	0.615	2.960	17.2	297		5.944	181.57	1.96
Partially Seasoned								
M5	0.631	2.948	27.6	273	358			
Turn down	2.853			390				
Sampling End	1.434					2.145	39.68	3.24
Cooldown					86	1.256	545.25	0.14
Charcoal Residue	0.1782					Total time	924.48	

Individual Phase Output and Emission Data

Bypass Damper Being Used Correctly

DAY 1	Ave Output kW	Max Output kW	Emissions g	Emissions g/kg	Emissions g/h
1/10/2015					
Start-up Phase	3.4	7.0	3.1	0.92	3.48
High Burn Rate	10.0	11.6	1.3	0.25	0.79
Low Burn Rate	10.6	13.6	1.1	0.22	0.54
Partially Seasoned sampling period only	9.4	11.4	0.2	0.11	0.25
	40.28	minutes			
Combined Run Daily Totals			5.6	0.35	0.39

Improper Use of Bypass Damper

DAY 1	Ave Output kW	Max Output kW	Emissions g	Emissions g/kg	Emissions g/h
15/12/2015					
Start-up Phase	2.3	4.8	11.7	3.52	12.64
High Burn Phase	6.7	7.6	4.3	0.87	2.52
Low Burn Phase	5.2	7.5	6.7	1.36	2.22
Partially Seasoned sampling period only	4.3	5.0	4.0	2.58	6.06
	39.68	minutes			
Combined Run Daily Totals			26.8	1.71	1.74

Overall Day Efficiency and Emission Results

Bypass Damper Being Used Correctly

	Energy In			Energy Out			Efficiency %	Total Mass Emitted g	ER g/kg	ER mg/MJ
	Dry Weight kg	Fuel GCV MJ/kg	MJ	Av kW	min	MJ				
DAY 1										
charcoal	0.105	30.00	3.2							
softwood	16.257	20.09	326.6							
total	16.151		323.4	4.5	873.1	236.4	73	5.6	0.35	24

Improper Use of Bypass Damper

	Energy In			Energy Out			Efficiency %	Total Mass Emitted g	ER g/kg	ER mg/MJ
	Dry Weight kg	Fuel GCV MJ/kg	MJ	Room Output Av kW	Time min	MJ				
DAY 1										
charcoal	0.178	30.00	5.3							
softwood	15.868	20.54	325.9							
total	15.689		320.6	2.8	924.5	156.0	49	26.8	1.71	171

From: Submissions
Sent: Wednesday, 17 February 2016 12:06 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 12:05:44 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Harold John Pearson
Organisation:
Contact Person:
Address for Service*: 104a Songer St., Stoke, Nelson 7011
Email*: pearsonharry@yahoo.co.nz
Phone*: 035477313
Other Phone:
Mobile Phone: 0274072074

I/we wish to be heard in support of my/our submission: Yes
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26, AQR.26A, AQ2B.3.3,
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances

: I support in part the above Plan Change Section
Reasons: To allow affordable, NES compliant wood burners, to be installed in airsheds B1, B2 and C, as the wood burner PM10 emissions from these airsheds do not breach NES regulations, and there is a lot more capacity in these airsheds for NES compliant wood burners than council staff and consultants have suggested.

The above is essential to ensure that people have an affordable choice in how they heat their homes, and for continual improvement in peoples health, comfort and well being. Warmer homes will also have a massive effect on respiratory illnesses, the prevalence of which is increasing despite a national average decrease.

It is not practical or efficient, to fully insulate homes that were built before home insulation regulations came into force. Therefore, it is essential that people living in older homes are given an affordable and efficient means to heat their homes, to ensure their mental and physical well being.
Substantial improvements in local air quality can be achieved solely by having someone research and investigate the sources of PM10 during periods of peak PM10 levels (e.g. 6.00 pm and midnight), which so far has NOT been done. This, combined with education and enforcement based on the results, will ensure that everyone will have a choice as to how they heat their homes.

When assessing 'the capacity' for additional woodburners, ambient PM10 levels have not been fully into account. 'Capacity' MUST be based on actual wood burner emissions relative to the number of wood burners, which has not been the case so far.

The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows:

Where amendments are sought, provide details below of what changes you would like to see: Allow the installation of NES compliant wood burners, to replace both compliant and noncompliant wood burners that are currently installed, in all air sheds, except for airshed A. (This will enable older wood burners to be affordably replaced and thus reduce PM10 emissions).

Remove the limit to the number of approved wood burners that can be installed in homes built prior to when government home insulation requirements came into force (this enables older homes that cannot be efficiently or properly insulated, to have an affordable heating option).

Additional Submission Points: At least 1 NCC staff member to be employed between 6.00 pm and midnight, between May and August inclusive (which is the period of peak PM10 emissions), to investigate sources of PM10 emissions, and to provide education and enforcement in order to reduce these emissions.

All PM10 emission reporting must take into account ambient PM10 levels, so that only PM10 emissions from woodburners, are taken into account when assessing capacity for additional woodburner installations.

:

From: Submissions
Sent: Wednesday, 17 February 2016 1:49 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 1:49:04 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Anthony Radley
Organisation:
Contact Person:
Address for Service*: 106 Arapiki Road
Email*: tony@radley.net.nz
Phone*: 9893603
Other Phone:
Mobile Phone: 0211903821

I/we wish to be heard in support of my/our submission: No
(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: No

: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra-low emission burning appliances

: I support the above Plan Change section
Reasons: Older homes such as mine require substantial energy input during winter to be comfortable and healthy to live in. Upgrading such houses to modern levels of airtightness and insulation is only partly practicable and is expensive. Heating by electricity has proven expensive for me and has not kept the home at a comfortable temperature. I have not installed a pellet burner because they are noisy, expensive, have limited output and depend on electricity and special fuel. Allowing homeowners more choice would hopefully allow me to install a burner with a suitably high output, thereby allowing us to live in a comfortable, healthy home at reasonable cost.

I have not perceived a domestic wood burner air quality problem affecting my address.
The decision I seek from the Council is that this part of the proposed plan Change be.: Retained
Where amendments are sought, provide details below of what changes you would like to see.:
Additional Submission Points: Because I do not have an existing burner I must use electricity or install a pellet fire and therefore must endure the cost of electricity and the discomfort which arises from insufficient heating. At the same time I must witness many households nearby enjoying the comfort of a logburner. This means effectively I am subsidising their air quality while being penalised in comfort. Allowing more households to install wood burners would provide a means to address this disparity.

From: Submissions
Sent: Wednesday, 17 February 2016 2:08 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 2:07:41 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: keta claudine everett
Organisation:
Contact Person:
Address for Service*: 14 Dodson Valley Road
Email*: keta_everett@msn.com
Phone*: 0220440866
Other Phone: 0220440866
Mobile Phone: 0220440866

I/we wish to be heard in support of my/our submission: Yes
(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: No

:
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):

: I support the above Plan Change section
Reasons: I have a large home with no heating. I would need at least two large heat pumps which i cannot afford to run or buy in an old house. it gets freezing in the winter and its not good for me or the children. A woodburner would be more cost effective and heat the home sufficiently. We really struggle in the winter The decision I seek from the Council is that this part of the proposed plan Change be.: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see.: I would like it to be legal for all people in atawhai to be able to have heating of their choice and sufficient heating ie a new woodburner installed under council concent

Additional Submission Points:

:

From: Submissions
Sent: Wednesday, 17 February 2016 2:49 p.m.
To: Administration Support
Subject: FW: Nelson Air Quality Plan Change A3 Submission on behalf of Ministry of Education - revised
Attachments: NZ1-12065136-Form 5 submission template for NCC Air Plan Change 3.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Jess Bould[SMTP:JESS.BOULD@BECA.COM]
Sent: Wednesday, February 17, 2016 2:47:44 PM
To: Submissions
Subject: Nelson Air Quality Plan Change A3 Submission on behalf of Ministry of Education - revised
Auto forwarded by a Rule

Good afternoon,

Please find attached a revised version of this submission as per the previous email.

The previous email stated some aspects were missing from the submission submitted this morning.

I note the disclaimer regarding trade competition was overlooked, however it was not clear in the previous email what information was not included.

Could you please advise specific additional information that is required, if any.

Regards,

Jess Bould
 Planner
 Beca
 DDI: +64 3 363 3461
 Cell: +64 27 4040455
 Ph. +64 3 366 3521

www.beca.com
www.Linkedin.com/beca

NZ Workplace Health & Safety Supreme Award 2014 // Best overall contribution to improving workplace H&S
CIBSE Building Performance Awards 2015 // International Project of the Year - Christchurch International Airport Artesian Heating & Cooling System

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FORM 5**Submission on publically notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991**

To: Nelson City Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
PO Box 13960
Christchurch

Attention: Jess Bould

Phone: (03) 363 3461

Email: Jess.Bould@beca.com

This is a submission on the Proposed Nelson Air Quality Plan Change A3 ('the proposal').

The specific parts of the application that the Ministry's submission relates to are:

- The timing of the introduction of Ultra Low Emission Burners (ULEBs)
- That provision is made in the proposed Plan Change for rectifying any decrease in air quality that may result from the installation of ULEBs with methods that do no impact on the ability of dischargers such as schools to be granted resource consents for existing and new activities.

Background:

The Ministry of Education (MoE) is responsible for providing the funding for the property and associated infrastructure for schools throughout the country including providing the means for heating the buildings. Schools are heated using a variety of methods and fuels depending on factors such as the price and availability of fuels in each location and the size and age of the school property. Many schools are heated with solid fuels such as coal and wood and a number of schools require resource consents for the discharges to air associated with their heating appliances.

The MoE promotes the use of environmentally friendly heating methods in schools and over recent years many schools have replaced older solid fuel boilers with heat pumps and other low emission heating systems. However, it is the responsibility of each school Board of Trustees to decide on the heating method used at each school and as school budgets are constrained not all schools can afford to convert their heating systems to low emission alternatives in the short term. Consequently when current resource consents for school boilers expire, schools need to be able to renew consents for their existing infrastructure or apply for a consent for an upgraded appliance such as a wood waste, wood pellet or diesel fired boiler.

Within Airsheds B2 and C there are 13 state and state integrated schools, some of which have resource consents, for the discharges to air from heating appliances, which are due to expire in the next 5 years¹. It is important for the ongoing operation of these schools that they are able to continue to heat their schools and provide a comfortable and safe working environment for pupils and staff.

Whilst the MoE acknowledges that the air quality monitoring and modelling information provided in the Section 32A report indicates that there is “room” in Airsheds B2 and C for the addition of 1600 Ultra Low Emission Burners (ULEBs), the MoE is concerned that the use of the capacity in the airshed by ULEBs will result in less “room” being available for school heating systems. This could result in requirements for school heating systems becoming stricter, making it more expensive and difficult for schools to heat their schools and renew their resource consents.

The MoE supports in principle the proposed methodology described in AQ2B.3.3 for reviewing the number of additional ULEBs that may be able to be installed in each airshed after 2017 but notes that for this method to provide reliable results, representative air quality monitoring data for all airsheds needs to be available, with the results regularly reviewed and analysed for evidence of any trends in pollutant concentrations. It is also noted that the methodology described in AQ2B.3.3 for airsheds B2 and C states that there is at present insufficient monitoring data available for these airsheds to quantify the degree of any downward trend in pollutant concentrations and that another two years of ambient air quality monitoring will be required to establish this. Consequently there is some uncertainty regarding the actual state of the air quality in these airsheds at present and that some caution needs to be applied when allowing additional discharges to be permitted within the airshed.

The MoE therefore recommends that the addition of new ULEBs into airsheds B2 and C should be delayed until the beginning of 2018 when an additional two years of monitoring data will be available and the number of additional ULEBs can be determined with more certainty, using the methodology proposed in AQ2B.3.3.

The MoE also recommends that provision should be made in the Proposed Plan Change for the possibility that the addition of new ULEBs in airsheds B2 and C results in a decline in air quality, or air quality in the airsheds declines due to other causes such as a lack of support for the Behaviour Change Programme. If this situation arises the MoE submits that the Council should not require stricter controls on dischargers such as schools and industries in these areas, but should rectify the decrease in air quality by requiring a decrease in emissions from the domestic sector. This could be implemented by requiring older non-compliant wood burners to be replaced with low emission burners, allowing fewer ULEBs and strengthening the measures included in the Behaviour Change Programme.

In summary the MoE supports in principle the adoption of Plan Change A3 with the following changes:

- The introduction of an allowance for additional ULEBs to be installed in airsheds B2 and C be delayed until 1 January 2018 when more ambient monitoring data will be available for these airsheds.
- The number of additional ULEBs that are to be allowed to be determined in 2018 using the additional ambient monitoring results and the methodology included in AQ2B.3.3.
- Provision is made in Plan Change A3 for rectifying any decrease in air quality in the airsheds that may result from the installation of ULEBs with methods that do not impact on the ability for dischargers such as schools and industries to be granted resource consents for existing

¹ At the time of writing this submission the numbers of consents requiring renewal in the next five years was not available.

and new activities. Any decrease in air quality resulting from the installation of ULEBs should be rectified by decreases in the emissions from the domestic sector.

The Ministry of Education's submission is summarised in the attachment.

The Ministry of Education seeks the following decision from the consent authority:

That the requested alterations set out in the attachment be accepted.

The Ministry wishes to be heard in support of their submission.

The Ministry could not gain an advantage in trade competition through this submission.



**Jess Bould, on behalf of the Ministry of Education
Planner
Beca Limited**

Date: 17 February 2016

Attachment:

Proposed Changes to Provisions

Provision	Support/Oppose	Issue	Relief sought
<p>AQR.26A Ultra-low emission burning appliances</p>	<p>Support in part</p>	<p>MoE supports the proposal to allow a fixed number of ULEBs to be installed in Airsheds B2 and C. However the Proposed Plan Change states that there is insufficient ambient monitoring data available to determine the trends in air quality in these airsheds at present. It is therefore not possible to be able to accurately determine the number of ULEBs that can be accommodated without creating a risk that air quality in the airsheds might deteriorate as a result.</p>	<p>Amend AQR.26A.1 in order to delay introduction of ULEBs into the airsheds until 2018, when another two year's of ambient monitoring data will be available.</p> <p><i>Within the Urban Area, the discharge of any contaminants into air from the burning of wood in any small-scale ultra-low emission burning device installed after the date of notification of this Plan 1 January 2018.</i></p>
<p>AQ2A.3.1 Context</p>	<p>Support in part</p>	<p>MoE supports in principle the certification process for determining the number of ULEBs that can be permitted in the Nelson Airsheds. However, MoE submits that it should be noted in the Context section of the Proposed Plan Change that it is possible that the anticipated improvements in air quality may not eventuate as a result of the installation of ULEBs or some other factor, that this be rectified by reducing the emissions from the domestic sector rather than requiring reductions from schools and industries.</p>	<p>Amend AQ2A.3.1 to identify that there is a risk that the anticipated improvements may not eventuate and to clarify the steps that will be taken if this situation arises.</p> <p><i>The Plan proposes to permit 4600 small scale ultra-low emission burning appliances in Airsheds B2 and C (collectively). This The allocation of appliances is will be based on monitoring and modelling undertaken in 2015 and 2017, which illustrated that ambient air quality levels in these airsheds was approaching "acceptable" levels (as described in Policy A5-1-3).</i></p>

Provision	Support/Oppose	Issue	Relief sought
AQ2B.3.3 Certification: Permitted appliances in Airsheds B2 and C	Support in part	MoE supports the certification process for determining the number of ULEBs that will be allowed in Airsheds B2 and C but submits that at present there is insufficient ambient air quality information available. MoE submits that the number of ULEBs permitted should be determined once another 2 years of ambient monitoring data has been collected.	<p>b) Through a certification process associated with updated monitoring and modelling after 2015 2017.</p> <p>This future certification approach recognises that the initial permitted allocation is based on a single “snapshot” of the Urban Area’s air quality levels, and that future assessments may indicate that additional appliances can be <u>may or may not be accommodated</u>....</p> <p><u>In the event that air quality in the airsheds does not improve to an “Acceptable” level, measures will be taken to reduce domestic heating discharges including reviewing:</u></p> <ul style="list-style-type: none"> ■ <u>the number of ULEBs permitted</u> ■ <u>the Behaviour Change Programme</u> ■ <u>The replacement programme for older non-compliant burners.</u> <p>Amend AQ2B.3.3 to allow for the determination of the number of ULEBs to be permitted in Airsheds B2 and C to be delayed until 1 January 2018.</p> <p><u>The Council will issue a BAC provided that the appliance is located on a site in Airshed B2 or Airshed C, and the following limits are not exceeded (from the date that Plan Change A3 was made</u></p>

Provision	Support/Oppose	Issue	Relief sought
			<p>operative);</p> <p>a) In Airshed B2, no more than 1000 appliances shall be certified; or</p> <p>b) In Airshed C, no more than 600 appliances shall be certified.</p> <p><u>and the limits determined using the methodology prescribed in AQ2B.3.4 (from 1 January 2018)</u></p>

From: Submissions
Sent: Wednesday, 17 February 2016 11:13 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 11:12:55 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Melissa Short
Organisation:
Contact Person:
Address for Service*: 2/125b Tasman Street
Email*: lissy_lane@hotmail.com
Phone*: 021 0264 1373
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: Yes
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No
:
:

Proposed Plan Change provision reference (e.g. AQR.26A): Limited number of wood burners allowed - in general
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):
: I oppose the above Plan Change Section
Reasons: - people should have the option of NES or ULE
- parts of Nelson have never had a pollution problem and are being regulated more strictly than airsheds or clean air zones in NZ with poor air quality that have not yet met national standards
- Nelson is the only Council in NZ to ban wood burners; all other Councils / unitary authorities deem keeping warm as important as cleaning the air
airsheds who have recently met national standards should be allowed to burners too
- Nelson City Council should implement a plan change that works to meet national standards. They should desist continuing to over reach the set limit by continuing to drill further and further down the proportion of PM10 well below what our Government asks; which is 300% stricter than what the World Health Organisation recommends
-

The decision I seek from the Council is that this part of the proposed plan Change be:: Deleted and replaced as follows:
Where amendments are sought, provide details below of what changes you would like to see:: - where there has been no history of pollution exceeding NES then approved NES burners allowed (numbers uncapped)
- a mixture of NES and ULE technology allowed in areas where pollution has recently met national standards
Additional Submission Points:
:

From: Submissions
Sent: Wednesday, 17 February 2016 11:20 a.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 11:19:55 AM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Melissa Short
Organisation:
Contact Person:
Address for Service*: 2/125b Tasman St
Email*: lissy_lane@hotmail.com
Phone*: 021 0264 1373
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: Yes
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No
:
:

Proposed Plan Change provision reference (e.g. AQR.26A): All
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): ULE
: I oppose the above Plan Change Section
Reasons: Should incorporate NES & ULE
The decision I seek from the Council is that this part of the proposed plan Change be.: Deleted and replaced as follows:
Where amendments are sought, provide details below of what changes you would like to see.: A mixture of ULE and NES burners. Uncapped.
Additional Submission Points: Apologies: I missed this additional submission point. I hope it can be added to my previous entry.
I am concerned that what has been proposed does nothing to address the idiosyncrasies to our plan which are often seen as unfair. One household can be using their burner, whilst their neighbour across the street is banned from using theirs.
One household can run their burner until it dies, whilst again in the same neighbourhood a home owner cannot upgrade to the cleanest technology on the burner market...

Many thanks,
Melissa
:

From: Submissions
Sent: Wednesday, 17 February 2016 3:12 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Woodburner SUBMISSION, Bev

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 3:12:11 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Peter Olorenshaw
Organisation: Nelson Woodburner Group
Contact Person: Peter Olorenshaw
Address for Service*: 10 Ralphine Way
Maitai Valley
Nelson
Email*: petero@inspire.net.nz
Phone*: 035466176
Other Phone: 035466176
Mobile Phone: 0276281686

I/we wish to be heard in support of my/our submission: Yes
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A, AQ2B.3
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Peter Olorenshaw
: I oppose the above Plan Change Section
Reasons: See attached document
The decision I seek from the Council is that this part of the proposed plan Change be.: Amended as follows:
Where amendments are sought, provide details below of what changes you would like to see.: See attached document
Additional Submission Points: Please see attached file (please contact me if this does not appear)

SUBMISSION ON
NELSON AIR QUALITY PLAN
PROPOSED PLAN CHANGE A3
WOODBURNERS

From: The Nelson Woodburner Group:

Melissa Short
Graeme O'Brien
Gaire Thompson
Greg West
Harry Pearson
Peter Olorenshaw

Contact Person: Peter Olorenshaw

10 Ralphine Way, Maitai Valley, Nelson,
tel.0-3 - 546 6176 any time, mobile 027 - 628 1686,
e-mail: peter@peteroarchitect.co.nz

Council Hearing:

We wish to be heard in support of our submission

Trade Competition:

None of our group could gain advantage in trade competition through this submission

Introduction:

We are very disappointed with this proposal it continues the pretense that NZ's Wood particulates have the same health effects as European Diesel and Coal particulates, it assumes low compliance with behavioral change initiatives to make a smoky chimney as socially unacceptable as cigarette smoking in public. It assumes the council's lack of proactive policing of smoky fires on winter nights to continue. It allows only a few burners into Airshed C where there has never been an exceedence of current NESAQ standards. And of course the poor people in Airshed A are offered nothing. Bizarrely it proposes to allow burners into new houses that need them least and as a result restricts them in older houses that need them most.

We are unconvinced by Ed Kiddle's report and the HAPINZ report that it is based on (see appendix 1 graphs). Particulate matter is a grab bag of particles of indeterminate size and widely varying chemical composition - this is not a contention that can be disputed, it is simply the definition of particulate matter. We suggest that there are serious flaws in using

particulate levels in Europe and their related health effects to assume similar health effects to NZ's completely different particulate makeup. In Europe the particulates are mainly from diesel and coal burning, in NZ ours are mainly from wood fires (see appendix 3): We know the carcinogenic polycyclic aromatic hydrocarbons adsorbed to the surface of diesel particulates are more than 10 times that of wood particulates yet you assume the health effects are the same. You treat one 10micron particle as being equivalently bad as 1000 ultrafine particles, when we know it is actually the particle numbers that matter and that the finer the particles are the worse they are for us. And in Europe people are exposed to these particulates throughout the year: In NZ we are exposed to particulates just over the winter evenings (when most people are inside, not outside), rather than year round. It is annual levels of cumulative exposure that we should be measuring says Jan Wright, the The Parliamentary Commissioner for the Environment (PCE), not numbers of exceedences.

The PCE in her Air Domain report says theoretical models like the HAPINZ study need to be "ground truthed" with facts on the ground* . Well Ed Kiddle's graphs do that, but not in the way he intended. They show a 25% increase in hospital admissions (per 100,000 people) over the 13 year period that particulate levels have fallen by 66% in every airshed in Nelson (in winter). Our contention, that has not been disputed, that cold damp houses are having a greater health impact then the reduction of our unusual particulates (see appendix graphs)

Firewood for 1/3 of Nelson families is or was free according to your surveys, electric heating is never free. An average woodburner puts out 20kW of heat. This is the equivalent of 10 electric heaters or 4 large heatpumps, yet we pretend that these old drafty villas that poor people live in can be adequately heated by a device that puts out a fraction of the heat and costs them \$100's of month to run. Old drafty houses are impossible to get anywhere near the insulation levels and airtightness of new houses, they need much greater heat input than new houses.

*p22 2015 PCA commentary on 2014 Air Domain report

Your policy of forcing people to use electric heating is in conflict with your commitments to reduce greenhouse gases. Burning wood is carbon neutral but electricity generation still is 30% from fossil fuels in NZ. It is probably worse than this at the time people are using heat pumps - winter evenings. It is this time of the day when the grid is struggling, that the fossil fuel stations will be ramped up to cope with demand. And it is simply wrong to say that in Nelson we get all hydro power so it doesn't matter, because the hydro power we use, means there is less to go North: Someone in the country will have to use more fossil fueled power because of our useage.

And your policy of restricting logburners is restricting resilience of our community. NES compliant burners can be used in an electricity cut, many for water heating as well as space heating and cooking. You should be increasing community resilience, not putting in policies that decrease it.

Council's Means of Compliance should change from Restricting Logburners to Restricting Smoking We think restricting logburners is poor policy and has resulted in a 25% increase in hospital admissions for respiratory illness. The council has been very low key about pouncing on smoky fires. You seem to have a policy of being reactive to complaints about smoky fires rather than having a proactive policy of policing smoke. We suggest you should have officers out on the streets on cold winter evenings actively policing the no smoky chimney policy. People should be given a 3 strikes warning: first visit would be an educational one, telling people how to burn cleanly, looking at their damper on the fire (can it be damped down too much - if so require it to have a stop installed), are they burning dry wood, where is the wood stored - is it dry etc), second visit is if they have have a smokey chimney again and a warning that the next time they will be fined, the forth time they will have their logburner removed. The council has shown minimal interest in devices that restrict smoke emitted. NCC should be promoting these and offering cheap loans to install them.

Council policy of denying people free heat by restricting logburners, rather than restrict restricting smoke needs to change. Present restrictions have resulted in cleaner air but sicker people. It is irresponsible of you to be maintaining policy that is making your city sicker.

Council Lobby for Law Change: We understand how the council are faced with meeting the National Environmental Standard for Air Quality. We are stuck with this for now. But what ask the council to do to lobby government for a law change on the basis that these burner restrictions have resulted in cleaner air but sicker people. We ask the council to lobby the government to take into account the chemicals adsorbed to particulates in setting air quality guidelines and to stop treating wood smoke particulates as harmful as coal and diesel ones undoubtedly are. And we ask you to lobby for an annual exposure standard rather than regulating numbers of short term spikes - as asked fro by the PCE.

Comments specifically about Proposals:

Mistake in Plan Change writing? : We can't see in the plan changes proposed where the Airshed restrictions are written in for New Houses. It appears to us that inadvertently you are proposing to let in ULEB's into any house new house in any airshed in Nelson.

Request Change from ULEBs every house in just Airsheds B2 & C to NES burners in Old Houses in All Airsheds (except in the new airshed D (see below), allow them in new houses there):

We ask for a fundamental change in the way you deal with air pollution in Nelson. We understand you have a current National Environmental Standard for Air Quality that you are obliged to comply with but we completely disagree with your proposed methods to get there. We have already mentioned moving from burner bans to smoke bans as the means to comply with the NES, but if we are going to stay with some restrictions on burner numbers it should be prioritised into those houses that need them most.

New houses with their very good insulation levels, their level of airtightness and their double glazing are the last ones that actually need logburners if we are going to restrict them.

1. Logburners should be prioritised into **older houses first** as these are the cold and damp drafty houses where our sick people are. Very few people in new houses with their good insulation and draftproofing are in fuel poverty, very few people in new houses are getting sicker.
2. These logburners allowed into older houses to be the **cheaper ordinary NES compliant burners** (not ULEBs)
3. **Let that run for a year** and see how much "headspace" there is before allowing new houses to put in burners.
4. If there is headspace for more logburners found after a year then allow **newer houses** to install burners, but they must be **ULEBs** (as owners of new houses are much less likely to be in fuel poverty: they are more likely to be able to afford a ULEB). We suggest this be done in decades: so initially pre-insulation standard houses have them, then if there is some headspace, pre 1980 houses, monitor that and if there is still some headspace, then 1990 houses and so on.

So we ask for AQR.26A.1 i) ULE burners allowed in any new house to be deleted and replaced with "NES compliant burners be allowed in any pre 1976 (or whenever the original insulation standards came in) houses"

Reason: We know there is limited "headspace" in this airshed if you are going to meet the existing NES for AQ, but we suggest you get there by policing smoke rather than restricting burner numbers. The real issue is fuel poverty and avoiding people living in cold damp houses; people in new houses are most likely to be able to afford the cost of

electrically heating their houses and their houses being new and up to current insulation standards should be much easier to heat.

Request New Airshed D to allow any NES burner into ANY house: We suggest a major flaw with the document is that the portion of airshed C that is North of the Wakapuaka Cemetery has never had an air pollution problem and should never have been part of airshed C. No other “clean” airshed in the country has a ban on logburners. We request that this document include cutting the present airshed C into two parts and the Northern part be called a new airshed, Airshed D. And that this airshed be able to install any ordinary NES compliant burner in any house.

Measures Proposed for Airshed B1: Airshed B1 actually has 62% higher pollution levels than Airshed A, when looked at on an annual basis (see appendix 2). It is this total annual pollution that the Parliamentary Commissioner for the environment is concerned about and says how we should be moving toward regulating. It is likely legislation will move in the direction and so it is stupid to allow new houses in this airshed to install logburners of any sort.

We request two things for this airshed:

1. Only pre insulation standard houses be allowed to install logburners and the burners they can put in are the cheaper ordinary NES compliant burners, rather than the expensive ULEB's. The very people who need these logburners most (those in fuel poverty) are the very ones most unlikely to be able to afford the extra \$3000 for a ULEB. You should not be instituting policies that exacerbate fuel poverty inequality: remember 1/3 of firewood is free according to your survey: those in fuel poverty often have a way of obtaining free firewood.
2. The Council look at restricting Industrial emissions in this airshed as they are over double domestic emissions over an annual basis. And an annual basis is what the PCE says we should be moving towards.

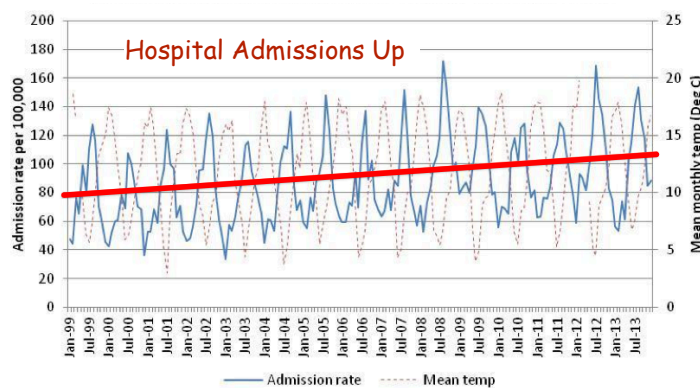
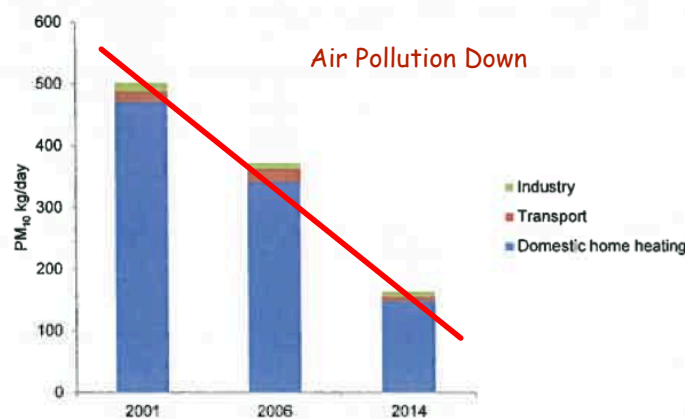
Airsheds A, B2 and C: covered above: - request change to allow new NES compliant burners into Old houses only, at least initially.

End of main section, see Appendix on following page

APPENDIX:

1. Air Pollution Down, Respiratory Illness up:

Upper graph is by Emily Wilton and is for Nelson Airshed A winter levels (trend line by us)
 Lower graph is from Ed Kiddle's report from the DHB (again trend line is by us) (note that this is per 100,000 people so is population growth corrected. This is not "up a little", it is a 25% increase over the same time period as there has been a 66% decrease in PM10 air pollution). Note all airsheds have had at least a 60% reduction over this 13 years.



Reason: Cold Damp Houses

Background Reason: Different Particulate Pollution is quite different, but treated the same under current National Environmental Standards. Our pollution is from predominantly woodsmoke, not diesel exhaust

2. Air Pollution in Airshed B1 (Tahunanui) is 62% greater than airshed A when measured over the year and more than double comes from Industry than comes from domestic fires in this airshed. The spreadsheet below is where we have simply added up the annual PM10 levels that Emily Wilton reports (these are in blue).

Air Pollution		(From Emily Wilton's Study 2014)					
Airshed	Dom Heatin	Industry	Motor Vehic	Total	Yearly PM10 emissions (kg)		
A Victory	18327	1594	2591	22512			
B1Tahuna	10044	23605	2899	36548	14036	difference	62 % more

Table 7.2: Monthly variations in daily PM₁₀ emissions in Airshed A.

	Domestic Heating		Industry		Motor vehicles		Total kg/day
	kg/day	%	kg/day	%	kg/day	%	
January	0	4%	2	24%	7	72%	10
February	0	4%	3	27%	7	69%	10
March	5	30%	4	23%	7	46%	15
April	16	58%	4	14%	7	26%	27
May	74	87%	4	4%	7	8%	85
June	138	90%	8	5%	7	5%	153
July	149	91%	8	5%	7	4%	164
August	134	90%	7	5%	7	5%	148
September	60	84%	4	5%	7	10%	71
October	18	60%	4	13%	7	25%	29
November	3	18%	4	28%	7	52%	14
December	1	7%	2	23%	7	69%	10
Total kg year	18327	4%	1594		2591		

Table 7.4: Monthly variations in daily PM₁₀ emissions in Airshed B1.

	Domestic Heating		Industry		Motor vehicles		Total kg/day
	kg/day	%	kg/day	%	kg/day	%	
January	0	0%	64.8	89%	8	11%	73
February	0	0%	64.8	89%	8	11%	73
March	0	0%	64.8	89%	8	11%	73
April	7	9%	64.8	81%	8	10%	80
May	43	37%	64.9	56%	8	7%	116
June	80	52%	64.6	42%	8	5%	153
July	87	54%	64.5	40%	8	5%	159
August	78	52%	64.5	43%	8	5%	151
September	26	27%	64.6	65%	8	8%	99
October	5	7%	64.5	82%	8	10%	78
November	0	1%	64.5	88%	8	11%	73
December	0	0%	64.8	89%	8	11%	73
Total kg year	10044		23605		2899		

3. PAH (Polycyclic Aromatic Hydrocarbons) adsorbed to the surface of carbon particles a factor of 10 more for diesels than for woodfires (Source 2004 Environment Court ruling on the Southern Link).

PAH	Wood Smoke µg/mg PM	Petrol Exhaust µg/mg PM	Diesel Exhaust µg/mg PM
Naphthalene	0	0	0
Acenaphthylene	0	0	0
Acenaphthene	0	0	0
Fluorene	0	0	0
Phenanthrene	4.3	13.4	5.4
Anthracene	2.1	0.5	0
Fluoranthene	3.0	13.6	22.3
Pyrene	3.0	10.4	19.0
Benzo[a]anthracene	1.1	2.8	19.4
Chrysene	0.7	3.2	42.8
Benzo[b]fluoranthene	0.4	0	37.4
Benzo[k]fluoranthene	0.6	0	17.9
Benzo[a]pyrene	0	0	0
Indenopyrene	0	0	0
Dibenzo[a,h]anthracene	0	0	0
Benzo[ghi]pyrene	0	0	0
Total	15.2	43.9	164.2

From: Submissions
Sent: Wednesday, 17 February 2016 3:36 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 3:35:44 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: JC Ironside
Organisation:
Contact Person:
Address for Service*: 6 Moore Road Wakefield 7095
Email*: julian@jcironside.nz
Phone*: 03 5419227
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): AQR. 26A.1
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra Low emission burning appliances

: I support in part the above Plan Change Section
Reasons: The wording of the rule should be made clear to ensure that clause (a) and (b) also apply to AQR.26A.1(i) as well as AQR.26A.1(ii).
The decision I seek from the Council is that this part of the proposed plan Change be.: Amended as follows:
Where amendments are sought, provide details below of what changes you would like to see.: AQR.26A.1
Within the Urban Area, the discharge of any contaminant into air from the burning of wood in any small-scale ultra-low emission burning appliance installed after the date of notification of this Plan into any new building, or any existing building that does not have an operable open fire or any small-scale solid fuel burning appliance, is permitted if:
(a) the appliance at all times:
(i) complies with the requirements of Appendix AQ2B, and
(ii) complies with the stack requirements in Appendix AQ3, and
(iii) burns no fuels in Rule AQR.20 (Prohibited Activities), and
(iv) is operated so that there is no discharge of excessive smoke (excluding a 15 minute start-up period), and
(b) where any appliance installed in accordance with this rule is successively replaced, the replacement small-scale ultra-low burning appliance complies with clause (a).
(Note: Compliance with Rule AQR.22 (General Conditions) is also required.

Additional Submission Points:

:

From: Submissions
Sent: Wednesday, 17 February 2016 4:22 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 4:22:23 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Hubert Berhard Altenburg
Organisation:
Contact Person:
Address for Service*: 52 Cleveland Tce 7010 Nelson
Email*: hubert@ihug.co.nz
Phone*: 03-5457097
Other Phone:
Mobile Phone:

I/we wish to be heard in support of my/our submission: No
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No
:
:

Proposed Plan Change provision reference (e.g. AQR.26A): Low emission and Ultra low emission woodturners
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances):

: I oppose the above Plan Change Section
Reasons: It`s nice and healthy to breath fresh air !!!! I`m also against more carbon emissions .
I know people who live in near new houses and are perfectly fine with using their heat pumps for heating but would apply for a permit for a woodburner right away just because they like the feel of a wood fire . Also electricity prices are forecast not to rise in the foreseeable future . Houses need to be proper insulated and then a strong heat pump is perfectly sufficient . We don`t need to go back polluting our backyards for people with access to free or cheap wood which is often not seasoned properly . Who knows what people feed their burners with in the middle of the night .

The decision I seek from the Council is that this part of the proposed plan Change be.: Deleted entirely
Where amendments are sought, provide details below of what changes you would like to see.:

Additional Submission Points:
:

From: Submissions
Sent: Wednesday, 17 February 2016 4:57 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)
Attachments: Woodburner-Submission-Tim-Skinner.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 4:57:25 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Tim Skinner
Organisation:
Contact Person: Tim Skinner
Address for Service*: 2 Brook Terrace
Nelson
Email*: tim@timskinner.nz
Phone*: 03 5488879
Other Phone:
Mobile Phone: 021668733

I/we wish to be heard in support of my/our submission: Yes
(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: No
: I could not gain an advantage in trade competition through this submission
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
:
Proposed Plan Change provision reference (e.g. AQR.26A): A3 Nelson Air Quality Plan - Ammendments to Woodburner Provisions
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): A3 Nelson Air Quality Plan - Ammendments to Woodburner Provisions
: I support in part the above Plan Change Section
Reasons: Allowance of NES approved woodburners. Ammend to propose option 3 of Plan Change report rather than the currently proposed option 1 of report.
The decision I seek from the Council is that this part of the proposed plan Change be: Amended as follows: Where amendments are sought, provide details below of what changes you would like to see: Allowance of NES approved woodburners. Ammend to propose option 3 of Plan Change report rather than the currently proposed option 1 of report.
Additional Submission Points:
:

Tim Skinner
2 Brook Terrace
The Brook, Nelson
Cell 021668733
tim@timskinner.nz

Yes, I would like to speak to my submission

Thankyou for the opportunity to submit.

I strongly support a plan change.

I support the removal of the current prohibited status as achieved in this proposed plan change. I do not support allocation of only ULEB's (Ultra Low Emmission Burners). I strongly request that the allocation of woodburners include the option of NES burners (National Emmission Standards) (as modelled in report). NES burners are extremely clean burning and efficient. Simple to operate and proven. Widely available and approved by council, cost effective, and not reliant on electricity to operate.

Where-as ULEBs may be similar or slightly better in efficiency. They are a lot more expensive to purchase and install. Only very recently created and in their infancy in product development, thus yet to be proven effective or reliable in real life use. Only very few models available and even fewer suppliers in Nelson. Reliability, practicality and maintenance of, yet to be determined. ULEB have not been requested by any Nelson residents in my relations with community to date. Whilst there have been overwhelming and daily requests to me in Nelson for the ability to install, or upgrade existing non-compliant fireplaces with NES approved woodburners.

There is a need to correct the inequity of the current situation of one home able to use their previously installed and approved burner, whilst their neighbour suffers with not being able to use or upgrade their current woodburner to heat their home.

There is a very unnecessary, observed and measured impact on the health and wellbeing of many families both young and old who are pleading to be able to keep their families warm during the coldest periods of winter. The currently restricted heating methods of electricity, (heatpumps), or gas are not effective at heating many Nelson homes and the increasingly financial burden with the continual rise in electricity, gas and diesel prices has affected many (These aren't carbon neutral either, where as burning of wood is). Wood is easily and cheaply accessible in Nelson with the majority of residents enjoying acquiring their all or part of their dry firewood for free (see NCC surveys).

The serious negative impact on Nelson's health occurred since the current restrictive rules is highlighted by sudden and continual increase over the last 12 years of Nelson hospital admissions for respiratory illness due to cold damp homes since 2004. A trend that bucks the current National trend and our neighbours Tasman district. (See Nelson District Health Board report and statistics for respiratory illness, also presented by Dr Nick Kiddle. See also Young persons & Children report on respiratory health by Nelson Marlborough District Health Board. And raised also by the NZ asthma Society).

Currently Nelson's rules are by far the most restrictive of all NZ.

If further incremental improvement in air quality of late was to have improved Nelson wellbeing, it

would have been observed. Unfortunately the opposite has been shown. It is now the opportunity to positively resolve this.

Thus a sensible approach to improving air quality beyond what has already been achieved, needs be balanced against the social, physical, mental and financial, wellbeing of our community, young and old.

I do not support option 1 as outlined and proposed in the plan change report.

But do strongly prefer option 3 with amendment of NES burners to be allowed rather than solely ULEBs allocated.

This option with NES burners is covered and modelled in the Plan Change report, and is also confirmed to fit within national standards & targets of non-exceedances as modelled and reported in the plan change report. Thus achieving the central government imposed regulations and achieving the Nelson City Council's goals whilst also achieving the needs the residents of Nelson have been pleading for. This is a sensible request to be able to effectively keep our homes and families warm dry and well throughout the year, by the most effective form of heat generation with the use of clean burning, carbon neutral woodburners.

Thankyou

Tim Skinner

From: Submissions
Sent: Wednesday, 17 February 2016 4:58 p.m.
To: Administration Support
Subject: FW: Nelson Air Quality Plan Plan Change A3 (Woodburners)
Attachments: Submission on Plan Change A3 Woodburners.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: leonie[SMTP:LEONIE@STAIGSMITH.CO.NZ]
Sent: Wednesday, February 17, 2016 4:57:39 PM
To: Submissions
Subject: Nelson Air Quality Plan Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Good afternoon,
Please accept this submission on behalf of our client, McCashin's Brewery for the Nelson Air Quality Plan Plan Change A3 (Woodburners).
A hard copy is in the mail.

Regards,
Jackie McNae
Resource Management Consultant
Phone (03) 548 4422

STAIG & SMITH LTD
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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	660 Main Rd Stoke Limited		
Organisation	McCashin's Brewery		
Contact Person	C/- Jackie McNae, Staig & Smith Ltd		
Postal address	PO Box 913	Business Phone	548 4422
	Nelson 7040	Home Phone	
		Mobile Phone	
Email	jackie@staigsmith.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)

Date

17 February 2016

SUBMISSION ON PLAN CHANGE A3 FOR MCCASHIN BREWERY**1.0 BACKGROUND**

- 1.1 McCashin's Brewery has an interest in the Air Quality Plan as they hold a current Discharge to Air Consent for their coal fire boiler on their premises. Their current Resource Consent for Discharge to Air, RM095176, enables the discharge to air from their coal fired boiler subject to meeting a maximum PM₁₀ concentration of 150mg/m³ from 1 January 2015, and subject to a total mass emissions rates of 0.18kg/hr after 1 January 2015. The Discharge Consent obtained in 2009 gave McCashin's Brewery a significant period of time from 2009 through to January 2015 to gradually upgrade their boiler system to reduce emissions to the levels set. Notwithstanding the option of delaying those upgrades, the McCashins made significant investment in the upgrade of their system in 2011 by installing a bag house system that dramatically reduced emissions of PM₁₀ to 25.7 mg/m³ and mass emissions to 0.05kg/hr by May 2012 levels well below what the Consent allows. This achievement has demonstrated the Company's commitment to playing their part in improving air quality in the City, and in particular, the Stoke Airshed.
- 1.2 The Company has supported the need to gain improvements in air quality from industrial and trade premises as well as from domestic household fireplaces.
- 1.3 Since the introduction of the Air Quality Plan there has been significant progress across the board in reduction of emissions to air through significant effort on the part of all sectors in the community, but there has been a cost to the community in terms of prohibiting small scale woodburners both domestically and in the commercial hospitality sector. This has restricted choices, has impacted on affordability of heating in some households, and has limited resilience of the domestic and commercial sector in the event of natural disasters. McCashin's Brewery is supportive of a review of the Rules around woodburners allowing opportunity for additional woodburners to be permitted, provided they can meet lower emission standards, which still enable Nelson to meet the requirements under the NES.
- 1.4 While the Submitter accepts that this current Plan Change is very limited in scope and does not represent a total review of the Air Quality Plan, the Company is concerned at the very restrictive provisions of the Air Quality Plan as it relates to the commercial hospitality sector. The Submitter is of the view that as far as possible under the scope of this Plan Change the Council needs to provide a better balance of provisions for the hospitality sector, and certainly under the forthcoming full review of the Air Quality Plan as part of the new Unitary Plan, the balance of provisions for the commercial/hospitality sector must be addressed.
- 1.5 A further matter, also beyond the scope of this limited Plan Change, that needs to be considered under the forthcoming review of all planning documents, is ensuring that the approach to air quality is not simply an approach that is punitive, but is an approach that includes incentives. By way of example, the current approach under the Air Quality Plan treats all sites as if they fall into only one category, either a situation of large scale fuel burning appliances or small scale fuel burning appliances. In the case of McCashin's Brewery, this is a large scale

trade premises, manufacturing alcoholic and non-alcoholic beverages, but it is also the site of a commercial café. The Air Quality Plan should treat the site as one site, and look at the site overall in terms of emissions from the site, where there are improvements gained in one part of the operation, such as in the operation of large scale fuel burning appliances, this should be taken into account in terms of the provision for small fuel burning appliances on the same site.

- 1.6 Despite the significant reductions the Company has been able to make in emissions to air from their large scale fuel burning appliance this has no impact on the way the Rules apply to the site for small scale appliances, providing little incentive for improvement in discharges. Despite the lack of incentive though, the Company has been committed to a process of reducing emissions from their site. The approach though is not a balanced approach looking at the total site emissions, and the Company encourages the Council in their review of the overall Air Quality Plan provisions to recognise this situation.
- 1.7 While the Company supports the step to enable a level of further burners within the Stoke Airshed, the lack of distinction between the domestic household situation and commercial hospitality premises is an issue that requires addressing.
- 1.8 The following sets out the specific Submissions in regard to the Plan Change.

Submission 1

AQr.26A - Ultra-low emission burning appliances. The Submitter supports in part the new rule.

Reasons:

McCashin's Brewery supports the introduction of the Rule providing for ultra-low emission burning appliances to be installed in a new building or an existing building, as this increases the choices available to residential and commercial premises for utilising a solid fuel burning appliance. The reason why the introduction of this new Rule is supported only in part is that it will be necessary to make amendment to the wording under the heading '*Item*' because the description as it currently stands would exclude the Submitter's premises, because the Rule as described under the '*Item*' column applies to new buildings and to existing buildings not using solid fuel. The McCashin's Brewery site comprises existing buildings which do use solid fuel in their large scale commercial boiler which is fired by coal. As such in order for McCashin's Brewery to get any benefit from the proposed new Rule, the description of the Rule will need to make specific reference to small scale burning appliances.

Decision Sought:

Amend AQr.26A as follows:

"AQr.26A Item

Existing buildings not using solid fuel within a small scale burning appliance"

Submission 2

This Submission opposes the narrow focus of the Plan Change which does not sufficiently address provision for burning appliances required in commercial premises, particularly those in the hospitality sector.

Reasons:

The Submitter acknowledges that this issue is beyond the narrow scope of the Plan Change, but in the background section to this Submission we have raised concerns regarding the very limited provisions for commercial premises, both in terms of small scale woodburning appliances for heating and in terms of use of such appliances for commercial cooking and smoking. While the Plan Change will allow commercial premises within the Stoke Airshed to install ultra-low emission burning appliances in to existing buildings, and this is supported, this change is only in certain Airsheds and the current restrictions in terms of small scale fuel burning appliances being used for commercial cooking and smoking only provide, as a permitted activity, this option to those that had such an appliance pre the notification of the Air Quality Plan. In all other circumstances the matter becomes discretionary. Given the importance of this sector to the regional economy, these provisions are too restrictive and Council needs to address this issue as part of the wider review of the Air Quality Plan.

Currently the provisions do not provide a level playing field, while the Submitter accepts Council has had to take quite restrictive steps to ensure that air quality in Nelson was improved so that the National Environmental Standards could be met, there is a lack of recognition of the contribution of the hospitality makes. There is a lack of acknowledgement that if people congregate at such premises for meeting friends and family for meals and social engagement, then they are not using their heating and cooking facilities in their homes, which will mean that allowing such use of heating appliances in commercial premises will not contribute to increases in discharges to air.

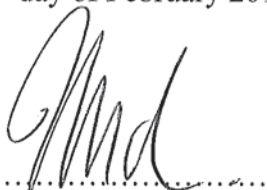
Decision Sought:

The Submitter accepts that Council cannot address this issue through this current Plan Change, but seeks through this process to highlight the issue and have Council direct staff to investigate this issue as part of the overall review process of the Air Quality Plan.

Hearing:

The Submitter does wish to be heard.

Dated this 17th day of February 2016



.....
(Signed by the Submitters Authorised Agent)

From: Submissions
Sent: Wednesday, 17 February 2016 6:28 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 6:28:01 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Neville Joseph MALE
Organisation:
Contact Person:
Address for Service*: 9 Rosebank Tce Stoke Nelson
Email*: maleman@actrix.co.nz
Phone*: 035479472
Other Phone: 035479472
Mobile Phone: 0272013020

I/we wish to be heard in support of my/our submission: Yes
(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: Yes

:
(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:
: Proposed Plan Change provision reference (e.g. AQR.26A): AQR.26A
Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Ultra Low Emission Burners

: I oppose the above Plan Change Section
Reasons: This type of woodburner is not necessary when the far more affordable NES burner will meet the standard of emission levels required.
The decision I seek from the Council is that this part of the proposed plan Change be.: Deleted and replaced as follows:

Where amendments are sought, provide details below of what changes you would like to see.: Amendments be made to replace the proposal to allow ULEBs with NES burners.

Additional Submission Points: The crux of the whole issue about using woodburners to heat homes is to do with what detrimental health effects occur from such use. It is now clear that since the restrictions on the use of woodburners has been in place the number of hospital admissions for respiratory disorders has in fact increased. This clearly points to the main cause of bad respiratory health is to do with people living in poorly insulated cold and damp homes. To continue to suggest emissions from wood burners are the major cause is now totally outdated and unsubstantiated by both monitoring data and health statistics. The monitoring of wood smoke emissions over the past 3 years has shown that there is now capacity to allow the NES woodburner to be installed as the minimum standard in all homes where the home owner has for over 10 years been prevented from replacing an open fire or older style woodburner,

From: Submissions
Sent: Wednesday, 17 February 2016 7:47 p.m.
To: Administration Support
Subject: FW: Submission on Proposed Plan Change A3 (Woodburners)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Bev, Woodburner SUBMISSION

From: Council Enquiries (Enquiry)
Sent: Wednesday, February 17, 2016 7:47:21 PM
To: Submissions
Subject: Submission on Proposed Plan Change A3 (Woodburners)
Auto forwarded by a Rule

Full Name*: Colin McBright

Organisation:

Contact Person:

Address for Service*: 41 Todd Bush Road

Email*: joygiffard@xtra.co.nz

Phone*: 539 3573

Other Phone:

Mobile Phone:

I/we wish to be heard in support of my/our submission: No

(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: No

:

(If 'yes' above) I am directly affected by an effect of the subject matter of the submission that: (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition.: No

:

:

Proposed Plan Change provision reference (e.g. AQR.26A): A3

Proposed Plan Change provision name (e.g. Ultra-low emission burning appliances): Plan Change A3 Woodburners

: I support the above Plan Change section

Reasons: would like to wholeheartedly support NCC's plan to allow woodburners to be installed in some houses which don't currently have woodburners.

I live in Todd Bush Road on a ten acre section. The boundary line between the urban and rural districts passes through my house. The previous owner removed the woodburner that had been in the house for forty years and with the council's regulations I have not been able to install a new one. As I have ten acres I produce my own supply of wood for heating. Because I can not use it I have to give this away to neighbours. This means it costs me a lot of money to heat my house and it is not environmentally friendly as I have to use electricity and gas which has to be produced. The Todd valley is a very low density housing with large rural areas and it is unlikely that an extra woodburner or two will cause a significant increase in air pollution.

The decision I seek from the Council is that this part of the proposed plan Change be: Deleted and replaced as follows:

Where amendments are sought, provide details below of what changes you would like to see: To allow the installation of woodburners in the Todd Valley.

Additional Submission Points:

: