From: Administration Support
Subject: FW: Woodburner Plan Change
Attachments: Woodburner submission.pdf

From: Bosma, Grant - FH Nelson[SMTP:GRANT.BOSMA@FULTONHOGAN.COM]
Sent: Wednesday, March 09, 2016 2:06:20 PM
To: Submissions
Cc: Nigel@mmp.co.nz
Subject: Woodburner Plan Change
Auto forwarded by a Rule

Good afternoon

Please find Fulton Hogan's submission on the proposed changes to the Woodburner regulations attached.

Thank you

Grant Bosma | **Fulton Hogan Ltd** | 121 Bolt Road | Private Bag 1, Nelson Mail Centre, Nelson, 7042, New Zealand | Phone +64 3 547 8679 | Fax +64 3 547 5375 | Mobile +64 21 970 769 | Web www.fultonhogan.com

RMA Further Submission Form in support of, or in opposition to, submission on publicly notified proposed plan change or variation

Nelson City Council
te kaunihera o whakatū

Return your submission by 5pm 18 March 2016 to:

Administration Support
RMA Plan Change Further Submissions
Nelson City Council
PO Box 645
Nelson 7040

OFFICE USE
Further Submission No:

(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with "Woodburner Plan Change" in subject line)

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

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

Further Submitter Details

Full Name	Fulton Hogan Limited		
Organisation	Fulton Hogan Limited		
Contact Person	Grant Bosma		
Address for Service	121 Bolt Road	Business Phone	5478579
	Private Bag 1	Home Phone	5446689
	Nelson	Mobile Phone	021 970 769
Email	Grant.Bosma@fultonhogan.com		

Council Hearing

I/we [X] wish to be heard (OR) [ ] do not wish to be heard in support of my/our further submission

[ ] (If wishing to be heard) I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a Further Submission:

[X] I/we represent a relevant aspect of the public interest

[X] I/we have an interest in the proposal that is greater than the interest of the general public.

Public information

Please note that your further submission is required to be made publicly available under the Resource Management Act 1991, as it is part of the record of the public consultation process.

Important note:

You *must* send a copy of this 'further submission' to the person who made the original submission within 5 working days of sending this further submission form to the Nelson City Council.

Submitter addresses are listed on the Index of Submitters within the Summary of Decisions Requested document available at the Council, libraries or online at www.nelsoncitycouncil.co.nz (search: Woodburner Plan Change).

I support~~/oppose~~ the Submission of:
(Delete as appropriate)

Submission Number:	66
Enter the **NAME** of the submitter	Southpine Ltd
Enter the **ADDRESS** of the submitter	C/- McFadden McMeeken Phillips
	PO Box 696
	Nelson

The particular parts of the submission I support/~~oppose~~ are:
(Delete as appropriate)

All of it.

The reasons for my support~~/opposition~~ are:
(Delete as appropriate)

For the reasons set out in the original submission

I seek the following decision:

The same decision as in the original submission

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

Date 9-MARCH-2016

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

I support~~/oppose~~ the Submission of:
(Delete as appropriate)

Submission Number:	65
Enter the **NAME** of the submitter	Eurocell Wood Products Ltd
Enter the **ADDRESS** of the submitter	C/- McFadden McMeeken Phillips
	PO Box 696
	Nelson

The particular parts of the submission I support/~~oppose~~ are:
(Delete as appropriate)

All of it.

The reasons for my support~~/opposition~~ are:
(Delete as appropriate)

For the reasons set out in the original submission

I seek the following decision:

The same decision as in the original submission

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

Date 9-MARCH-2016

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

Submission F2

RMA Further Submission Form in support of, or in opposition to, submission on publicly notified proposed plan change or variation

Nelson City Council
te kaunihera o whakatū

Return your submission by **5pm 18 March 2016** to:

Administration Support
RMA Plan Change Further Submissions
Nelson City Council
PO Box 645
Nelson 7040

OFFICE USE
Further Submission No:

(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with "Woodburner Plan Change" in subject line)

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

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

Further Submitter Details

Full Name	Robyn Deane		
Organisation			
Contact Person	Robyn Deane		
Address for Service	89 Golf Rd	Business Phone	5486117
	Tahuna	Home Phone	
	Nelson	Mobile Phone	0273351796
Email	n/k		

Council Hearing

I/we ☑ wish to be heard (OR) ☐ do not wish to be heard in support of my/our further submission

☐ *(If wishing to be heard)* I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

RECEIVED
19 MAR 2016
NELSON CITY COUNCIL
Customer Service

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a Further Submission:

☑ I/we represent a relevant aspect of the public interest

☐ I/we have an interest in the proposal that is greater than the interest of the general public.

Public information

Please note that your further submission is required to be made publicly available under the Resource Management Act 1991, as it is part of the record of the public consultation process.

Important note:

You *must* send a copy of this 'further submission' to the person who made the original submission within 5 working days of sending this further submission form to the Nelson City Council.

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I support/oppose the Submission of:
(Delete as appropriate)

Submission Number: 4	
Enter the **NAME** of the submitter Cole Ryan	
Enter the **ADDRESS** of the submitter 16A Iwa Road Nelson	

The particular parts of the submission I support/oppose are:
(Delete as appropriate)

The Right to heat my own 100 year old Home for my family with clean Dry wood.
without Huge Heating Bills.

The reasons for my support/opposition are:
(Delete as appropriate)

I seek the following decision:

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

9/3/16.
Date

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

Jessica Fechney

From: Submissions
Sent: Friday, 11 March 2016 10:01 p.m.
To: Administration Support
Subject: FW: Further submission on Plan Change A3 Woodburners

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Jessica

From: Council Enquiries (Enquiry)
Sent: Friday, March 11, 2016 10:00:46 PM
To: Submissions
Subject: Further submission on Plan Change A3 Woodburners
Auto forwarded by a Rule

Further Submitter Details
Full Name *

Owen Tasker

Organisation
Contact Person
Address for Service *

46 Citrus Lane, Enner Glynn, Nelson 7011

Primary Phone *

0210476352

Secondary Phone
Email *

owen.tasker@raywhite.com

Council Hearing
EditableRadioField6312
Please select...

I / we DO NOT wish to be heard in support of my/our further submission

Eligibility
Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we have an interest in the proposal that is greater than the interest of the general public

Further Submission
Please select...

I support the Submission of:

Submission Number *

97.1

Name of the submitter *

Tim Skinner

Address of the submitter *

2 Brook Terrace, Nelson

The particular parts of the submission I support or oppose are *:

I support everything Tim says in his submission. We need to be able to install NES burners into any home in Nelson. I agree people need to be trained in the use of dry wood. I am a real estate salesperson and know the demand for homes with current wood burners.

The reasons for my support or oppostion are:

Tim's submission is clear and true.

I seek the following decision *:

Like Tim I strongly prefer Option 3, with the amendment that NES burners be allowed rather than solely allowing ULEBs.

EditableLiteralField6331

Jessica Fechney

From: Submissions
Sent: Tuesday, 15 March 2016 8:50 p.m.
To: Administration Support
Subject: FW: Further submission on Plan Change A3 Woodburners

Categories: Jessica

From: Council Enquiries (Enquiry)
Sent: Tuesday, March 15, 2016 8:50:08 PM
To: Submissions
Subject: Further submission on Plan Change A3 Woodburners
Auto forwarded by a Rule

Further Submitter Details
Full Name *

John and Helen Dunlop

Organisation

-

Contact Person

Helen Dunlop

Address for Service *

209 Redwood Valley Road,
RD1, Richmond, Nelson.

Primary Phone *

03 544 1629

Secondary Phone
Email *

dunlop@ts.co.nz

Council Hearing
EditableRadioField6312
Please select...

I / we DO NOT wish to be heard in support of my/our further submission

Eligibility
Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we have an interest in the proposal that is greater than the interest of the general public

Further Submission
Please select...

I support the Submission of:

Submission Number *

94

Name of the submitter *

Peter Olorenshaw

Address of the submitter *

10 Ralphine Way,
Maitai Valley, Nelson.

The particular parts of the submission I support or oppose are *:

The entire submission, in particular the sections pertaining to Airshed A; the emphasis on providing a cheaper heating option to those in fuel poverty; those in older, drafty and/or damp homes; and the option of installing an NES burner in preference to the prohibitively expensive ULEB option.
Policing of existing high emission fires which belch out smoke continuously, and tight controls over selection of firewood would go further to improving air quality than the current inflexible regime which offers no hope for properly owners reliant on electric heat.

The reasons for my support or oppostion are:

Our daughter and granddaughter live in Airshed A, and although the house is well insulated, it is old and cold and is heated solely by a heat pump and mobile electric heaters. Power costs over the winter months are crippling for them, and we are concerned for their health and well being with winter looming . Being cold and on a tight budget without the comfort of the warmth and dryness of a wood fire is soul destroying.

I seek the following decision *:

That log burners should be prioritized into older homes in any air shed first.
Policing smoke emissions from existing fires is a far more effective way of reducing pollution than stopping those in serious need from owning a wood burner.

EditableLiteralField6331

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Nelson City Council
te kaunihera o whakatū

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Nelson 7040

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OFFICE USE
Further Submission No:

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

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

Further Submitter Details

Full Name	Gregory Christopher West		
Organisation			
Contact Person	Rita Van Ideleyntie		
Address for Service	House (2) 153 Vanguard St	Business Phone	035661433
		Home Phone	035483665
		Mobile Phone	021 1210735
Email	gregandritavan@gmail.com		

Council Hearing

I/we ☑ wish to be heard (OR) ☐ do not wish to be heard in support of my/our further submission

☐ *(If wishing to be heard)* I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

Eligibility

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☑ I/we represent a relevant aspect of the public interest

☐ I/we have an interest in the proposal that is greater than the interest of the general public.

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I support/oppose the Submission of:
(Delete as appropriate)

Submission Number: 87	
Enter the **NAME** of the submitter	Nelson Malbough.
Pete Burton & Ted Riddle	Dishrict health Board.
Enter the **ADDRESS** of the submitter	Angela Lenz
281 Queen St	281 Queen St. Richmond 7020
Richmond. 7020	

The particular parts of the submission I support/oppose are:
(Delete as appropriate)

7/ prohibition of ULEB in Victory Airshed (A) & Tahunanui (B)
17/ WHO - health effects PM10 & PM 2.5 - no safe level.
Environet. LTD -- promotes maintenance or enhancement of existing air quality.
23/ cold home effects - however good air quality should not be compromised at the expense of heating cold houses. etc.

The reasons for my support/opposition are:
(Delete as appropriate)

(7) The sampling station on Vincent St - is not situated within the main residential area - it is semi industrial - and next to the proposed southern Route - will NMDHB oppose that? - Airshed A deserves subsidised ULEB and NES Burners -
(17) Environet are private contractors - who have a vested interest in accessing public funds - for ever. Our population is increasing, human activity - but you don't acknowledge natural sources or other more toxic forms/sources of PM10 - PM 2.5 (23) We always have had good air quality - compared globally/internationally.

I seek the following decision:

(7) Airshed A - should not be further disadvantaged/compromised and set up by NCC - for the southern Route - and vast quantities of toxic PM 10 & PM 2.5
(17) the use of private contractors/advisors who have a vested interest in maintaining perpetual access to the public purse. and research based on dubious modelling data over a relatively short winter perod. - should be further questioned.
(23) New NESAQ Standards should be the frame of reference that will reflect a clearer picture that in fact our air quality has compared well internationally

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

Date 16/3/16

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

I support/oppose the Submission of:
(Delete as ~~appropriate~~)

Submission Number:	103
Enter the **NAME** of the submitter	Derek Shaw.
Enter the **ADDRESS** of the submitter	PO Box 645 Nelson 7040

The particular parts of the submission I support/oppose are:
(Delete as appropriate)

Page (3) 'The recognition that there is no safe level for PM10 with respect to adverse human health effects' etc
'The ability of the proposed Behaviour change program to achieve its target etc'
The possible changes being signalled to the NES for Air Quality including the possible change from PM10 to PM2.5 for measuring particular matter in the future etc....

The reasons for my support/opposition are:
(Delete as appropriate)

1/ The Modelling underpinning the Present NESAQ - Based on 24/7 exposure to PM10 - is 300% above WHO recommendations so presently - NCC has enforced legislation that is outdated and has no scientific basis in fact. It cannot be qualified in Health The inability of NCC to produce or commit to a Behaviour State Change program - has led instead to persecution and prohibition - of its ratepayers ... - The vast majority of Councils have not chosen to do this - instead prioritising people being warm in their home → environment.

I seek the following decision:

That the Panel - consider the social/health consequences of disallowing the vast majority of ratepayers - elderly young family, new immigrant low socio economic groups access to affordable NES Burners - ULEB exclude these people - and will create social ghetto's + Social exclusion. That the Panel show some foresight into how a well structured supported and enforced Behaviour change program should have been the first priority of NCC - and still can Be.

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

16/3/16
Date

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

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Nelson City Council
te kaunihera o whakatū

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RMA Plan Change Further 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 "Woodburner Plan Change" in subject line)

OFFICE USE
Further Submission No:

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

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

Further Submitter Details

Full Name	Aimee Storm		
Organisation			
Contact Person			
Address for Service	21 Manson Ave Stoke	Business Phone	
		Home Phone	
		Mobile Phone	0277228954
Email	alblatchford@live.com		

Council Hearing

I/we ☐ wish to be heard **(OR)** ☑ do not wish to be heard in support of my/our further submission

☐ ***(If wishing to be heard)*** I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a Further Submission:

☑ I/we represent a relevant aspect of the public interest

☐ I/we have an interest in the proposal that is greater than the interest of the general public.

Public information

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Important note:

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Submitter addresses are listed on the Index of Submitters within the Summary of Decisions Requested document available at the Council, libraries or online at www.nelsoncitycouncil.co.nz (search: Woodburner Plan Change).

I support/oppose the Submission of:
(Delete as appropriate)

Submission Number:	10, 14
Enter the **NAME** of the submitter	~~[illegible]~~ Graham & Jennifer St John David John McNicoll
Enter the **ADDRESS** of the submitter	298 Seaview Rd 389 Suffolk rd

The particular parts of the submission I support/oppose are:
(Delete as appropriate)

Council should allow use of both ULEB's + NES wood burners.

The reasons for my support/opposition are:
(Delete as appropriate)

We currently have a non-compliant wood burner installed. We would like to replace it before winter. We are in airshed B2.
ULEB's are inefficient, they do not provide adequate heating and are too expensive to install.
NES woodburners are more efficient and are much more reasonably priced

I seek the following decision:

To be able to replace my non-compliant woodburner with a NES woodburner.

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

15/3/16
Date

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

Jessica Fechney

From: Submissions
Sent: Thursday, 17 March 2016 2:27 p.m.
To: Administration Support
Subject: FW: Further submission on Plan Change A3 Woodburners

Categories: Jessica

From: Council Enquiries (Enquiry)
Sent: Thursday, March 17, 2016 2:27:18 PM
To: Submissions
Subject: Further submission on Plan Change A3 Woodburners
Auto forwarded by a Rule

Further Submitter Details
Full Name *

Alonzo Kelly

Organisation
Contact Person
Address for Service *

1/15 Dorothy Annie Way, Nelson

Primary Phone *

022 161 7723

Secondary Phone
Email *

lonkelly@mac.com

Council Hearing
EditableRadioField6312
Please select...

I / we DO NOT wish to be heard in support of my/our further submission

Eligibility
Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we represent a relevant aspect of the public interest

Further Submission
Please select...

I support the Submission of:

Submission Number *

94

Name of the submitter *

Peter Olorenshaw and others, Nelson Woodburner Group

Address of the submitter *

10 Ralphine Way, Maitai Valley, Nelson

The particular parts of the submission I support or oppose are *:

I support submission statement number 94.2: Airshed C includes large areas that have never had a documented air quality exceedance and lumping this area with the southern portion of Airshed C is costly, environmentally harmful to the significant extent it will result in burning of non-renewable fossil fuels for gas fires and electrical generation, particularly at the times heat pumps will be running and stressing the electric grid. There is no scientific basis to contend restrictions to logburners in the northern part of the current Airshed C will move air quality in the areas of greatest concern in the desired direction.

The reasons for my support or oppostion are:

I support the reasoning of the original submission. Airshed C includes large areas that have never had a documented air quality exceedance and lumping this area with the southern portion of Airshed C is costly, environmentally harmful to the significant extent it will result in burning of non-renewable fossil fuels for gas fires and electrical generation, particularly at the times heat pumps will be running and stressing the electric grid. There is no scientific basis to contend restrictions to logburners in the northern part of the current Airshed C will move air quality in the areas of greatest concern in the desired direction.

I seek the following decision *:

Divide Airshed C into two parts, and call the northern part Airshed D. Allow NES compliant burners to be installed in any house in the new Airshed D.

EditableLiteralField6331

Bev McShea

From: Submissions
Sent: Thursday, 17 March 2016 7:58 p.m.
To: Administration Support
Subject: FW: Further submission on Plan Change A3 Woodburners

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Thursday, March 17, 2016 7:58:22 PM
To: Submissions
Subject: Further submission on Plan Change A3 Woodburners
Auto forwarded by a Rule

Further Submitter Details
Full Name *

Erin Dunlop

Organisation
Contact Person

Erin Dunlop

Address for Service *

5 Rentone st, Stepneyville, Nelson 7010

Primary Phone *

0275689532

Secondary Phone
Email *

eedunlop@gmail.com

Council Hearing
EditableRadioField6312
Please select...

I / we DO NOT wish to be heard in support of my/our further submission

Eligibility
Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we represent a relevant aspect of the public interest

Further Submission
Please select...

I support the Submission of:

Submission Number *

94

Name of the submitter *

The Nelson Woodburner Group

Address of the submitter *

10 Ralphine Way, Maitai Valley, Nelson

The particular parts of the submission I support or oppose are *:

pages 3, 4 and 5

The reasons for my support or oppostion are:

There needs to be a more specific approach to reducing smoke emissions, and targeting industial emissions as well as residential emissions is vital if the council is going to achieve its goal. In addition to this aspect, I agree that education and enabling poorer / less educated residents to burn cleaner fires would be a far more effective way of reducing air pollution in Nelson than restricting installation of NES compliant burners. A more sensible approach to zoning is also necessary to enable reductions in the most relevant areas. There needs to be a more thorough and relevant analysis of effects in regards to wood smoke particulates in order for the council to draw conclusions towards wood smoke particulates and the link to reduced health.

I seek the following decision *:

To oppose the proposed change to the Nelson Air Quality Plan on A3 woodburners.

EditableLiteralField6331

Bev McShea

From: Submissions
Sent: Friday, 18 March 2016 6:51 a.m.
To: Administration Support
Subject: FW: Further submission on Plan Change A3 Woodburners

Categories: Bev

From: Council Enquiries (Enquiry)
Sent: Friday, March 18, 2016 6:50:44 AM
To: Submissions
Subject: Further submission on Plan Change A3 Woodburners
Auto forwarded by a Rule

Further Submitter Details
Full Name *

Rene Haeberli

Organisation

EnviroSolve Ltd

Contact Person

Rene Haeberli

Address for Service *

133 Ohakune Road, RD 3 Wanganui/Raetihi

Primary Phone *

06 385 4871

Secondary Phone

021 24 24 211

Email *

rene.haeberli@xtra.co.nz

Council Hearing
EditableRadioField6312
Please select...

I / we wish to be heard in support of my/our further submission

Eligibility
Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we represent a relevant aspect of the public interest, I/we have an interest in the proposal that is greater than the interest of the general public

Further Submission
Please select...

I support the Submission of:

Submission Number *

39.1

Name of the submitter *

Hazel Thelin

Address of the submitter *

9 Ngatiawa Street, Nelson South, Nelson 7010

The particular parts of the submission I support or oppose are *:

Hazel Thelin is a represantative of the following submission, which I support: 47.1, 48.1, 50.1, 55.1, 71.1, 101.1

The reasons for my support or oppostion are:

ULEBs are the cleanest and most efficient wood burners but only if they are fully automatic ULEBs. Test in Nelson showed that manual ULEBs incorredtly used (which is very easy to do - human errors) are seven times higer emission than tested and have a 35 % reduction of efficiency. Theyr would not be even allowed under NES standard 4012/4013

I seek the following decision *:

Allowing only fully automatic ULEBs which also do not require electricity

EditableLiteralField6331

35.1

Name of the submitter *

Dan McGuire

Address of the submitter *

45 Domett Street Nelson

The particular parts of the submission I support or oppose are *:

The submission of Dan is one of all the below submission. I support the use of so called LEB or NES approved wood burner if they have a secondary lowering emission devices fitted on top of their chimney

The reasons for my support or oppostion are:

29.7, 35.1, 38.1, 42.1, 43.1, 53.1, 57.1, 58.1, 61.1, 64.1, 69.1,73.2, 77.1, 80.1, 81.2 84.1,89.1, 90.1, 91.1, 93.1, 93.2, 94.1, 94.2, 94.3, 106.1, 107.1

Second lowering emission devices fitted on chimney like the OekoTube are the most cost effective device, very quick installed and efficient. Proven in Europe and in tests on New Zealand. It allows all people to have a fire, have warm and comfort during winter time and cleans the air up immediately. Nelson City Council accordingly to Dr Emily Wilton's report you only need a reduction of about 31 % and you will comply. Electrostatic filter have an efficiencyr of at least 60 %. It will everybody in Nelson a wood fire and can be financed through a rate scheme over 5 years.

I seek the following decision *:

Please allow the people form Nelson NES approved burners when the get a secondary lowering emission device fitted.

EditableLiteralField6331

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Nelson City Council
te kaunihera o whakatū

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Nelson City Council
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OFFICE USE
Further Submission No:

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

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

Further Submitter Details

Full Name	(Mrs) Rosemary Adams		
Organisation			
Contact Person			
Address for Service	13 Ledbury Road, Atawhai, Nelson. 7010	Business Phone	
		Home Phone	9276228
		Mobile Phone	
Email			

Council Hearing

I/we ☐ wish to be heard **(OR)** ☑ do not wish to be heard in support of my/our further submission

☐ ***(If wishing to be heard)*** I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a Further Submission:

☑ I/we represent a relevant aspect of the public interest

☐ I/we have an interest in the proposal that is greater than the interest of the general public.

Public information

Please note that your further submission is required to be made publicly available under the Resource Management Act 1991, as it is part of the record of the public consultation process.

Important note: Original Submitter 94 - Peter Olorenshaw

You *must* send a copy of this 'further submission' to the person who made the original submission within 5 working days of sending this further submission form to the Nelson City Council.

Submitter addresses are listed on the Index of Submitters within the Summary of Decisions Requested document available at the Council, libraries or online at www.nelsoncitycouncil.co.nz (search: Woodburner Plan Change).

Submission on Plan Change A3 (woodburners) to the Nelson Air Quality Plan

Submitter: (Mrs) Rosemary Adams,
13 Ledbury Road,
Atawhai,
Nelson.

I support a plan change to install NES burners in homes.
Air quality is one aspect of a healthy environment, however warm homes are essential as we are inside more than outside during the winter months.

A room temperature of 18 - 21°c is recommended by the Ministry of Social Development especially for people with an illness, older people, or if you have babies living in your home. Our whanau fits into those three categories.

According to He Kainga Oranga Warm Homes for Elder New Zealanders (WHEZ) the % of people over 65yrs in Aotearoa will increase from 12% to 22% over the next 25yrs. WHEZ also advocates for improved heating in homes as that may reduce respiratory infections, the likelihood of hospital admissions and improve the quality of life for older people.

We are all aware of the importance of insulation in homes along with reducing heat loss (curtains & reducing draughts). Double glazing of windows is expensive so not an option for those on modest or low incomes.

We previously lived in a home with a wood burner as the only means of heating our home. There were never issues of mould or dampness and the home was always warm for the whanau.

Newer models of wood burners create little air pollution and are efficient. They can be cheaper than electricity and produce a lot more heat. Wood as a fuel for heating is readily available. Gathering and chopping firewood is a healthy physical activity and it is renewable.

The Asthma Foundation (te hā) describes wood burners as a healthy form of heating. Respiratory disease, according to te hā, is New Zealand's third most common cause of death, costing the country $5.5 billion annually.

Last year was our first year in a house with only a heat pump for heating. The living room, with a heat pump, stayed warm when it was turned on, however the rest of the house was very cold during the winter.

Our power bills shot up during the winter as heat pumps are costlier to run on cold nights when ambient temperatures are very low. A combination of heat pump and wood burner for those very cold days and nights would greatly contribute to a healthier home and whanau.

R. Adams. 18-3-16

Submission F11

RECEIVED
17 MAR 2016
Nelson City Council
te kaunihera o whakatu
NELSON CITY COUNCIL
Customer Service

RMA Further Submission Form in support of, or in opposition to, submission on publicly notified proposed plan change or variation

Return your submission by **5pm 18 March 2016** to:

Administration Support
RMA Plan Change Further 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 "Woodburner Plan Change" in subject line)

OFFICE USE
Further Submission No:

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

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

Further Submitter Details

Full Name	Richard Adams		
Organisation	—		
Contact Person	Richard Adams		
Address for Service	113 Hardy Street	Business Phone	03 5466676
	Nelson	Home Phone	5466850
		Mobile Phone	027 6956955
Email	adamsuntaudra@xtra.co.nz		

Council Hearing

I/~~we~~ ☑ wish to be heard **(OR)** ☐ do not wish to be heard in support of my/our further submission

☑ ***(If wishing to be heard)*** I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a Further Submission:

☑ I/we represent a relevant aspect of the public interest

☐ I/we have an interest in the proposal that is greater than the interest of the general public.

Public Information

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Submitter addresses are listed on the Index of Submitters within the Summary of Decisions Requested document available at the Council, libraries or online at www.nelsoncitycouncil.co.nz (search: Woodburner Plan Change).

I support/~~oppose~~ the Submission of:
(Delete as appropriate)

Submission Number:	94
Enter the **NAME** of the submitter	Peter Clerenshaw Nelson Woodburner Group
Enter the **ADDRESS** of the submitter	c/o 10 Ralphine Way Nelson

The particular parts of the submission I support/~~oppose~~ are:
(Delete as appropriate)

To allow greater use of woodburners in the inner city.

The reasons for my support/~~opposition~~ are:
(Delete as appropriate)

We own 8 Church Street. It has been changed into a vegetarian restaurant and as it is a very old building the benefits of a fire far outweigh the heatpump / gas options available. It is far more economical and creates a more pleasant ambience.

I seek the following decision:

We would like to put a woodburner into the premises. We have operated a fire in our Hardy St property for 19 years, and have never had complaints about smoke emissions.

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

Date 18/03/16

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

Submission F12

Further submissions on Plan Change A3 (Woodburners) F12

Further Submitter Details

Full Name *
Charmian Koed
Organisation

Contact Person

Address for Service *
5 Maire Street
Nelson 7011
Primary Phone *
5486658
Secondary Phone

Email * koed@xtra.co.nz

Council Hearing

Please select...

I DO NOT wish to be heard in support of my further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I represent a relevant aspect of the public interest

Further Submission

Please select.

I support the Submission of:

Submission Number *
103
Name of the submitter *
Derek Shaw, Nelson Environment Centre
Address of the submitter *
PO Box 602, Nelson

Submission F12

The particular parts of the submission I support or oppose are *:
103.1
" Support the objective and policies of the Nelson Air Quality Plan and note that the proposed plan change does not propose any changes to these. "

103.2
1) "Nelson Environment Centre supports provisions in proposed Plan Change A3 that only allow ULEBs to be installed in two airsheds (B2 & C), i.e. no additional NES woodburners in any airsheds."

2) "Rather than allowing ULEBs in Airsheds B2 and C now, taking a more cautious approach is preferable, allowing for them to be introduced only when monitoring clearly indicates an ongoing improvement in air quality."

The reasons for my support or oppostion are:
103.1
Great improvements in air quality have been achieved under the policies of the Nelson Air Quality Plan but there are still improvements to be made.

103.2
1) Council decided, on good evidence, to restrict new woodburners to ULEBs and not NES burners, because of levels of emissions.
2) Further monitoring of air quality in all airsheds is necessary.

I seek the following decision *:
103.1
1. Do not make changes to the objective and policies of the Nelson Air Quality Plan through the proposed Plan Change A3 process.

103.2
1) That Council restricts new woodburners to ULEBs.
2) That Council applies the precautionary approach to all aspects of the proposed Plan Change.

Further submission on Plan Change A3 (Woodburners)

Further Submitter Details

Full Name *
Charmian Koed
Organisation

Contact Person

Address for Service *
5 Maire Street
Nelson 7011
Primary Phone *
5486658
Secondary Phone

Email * koed@xtra.co.nz

Council Hearing

Please select...

I / we DO NOT wish to be heard in support of my/our further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we represent a relevant aspect of the public interest

Further Submission

Please select...

I oppose the Submission of:

Submission Number *
36
Name of the submitter *
Bev Webster
Address of the submitter *
7 Chamberlain Street, Tahunanui Hills, Nelson

The particular parts of the submission I support or oppose are *:
36.1 "Amend the Plan Change to allow ultra low emission burners to be installed in residential properties in Tahunanui Hills north of Maire Street, even though Tahunanui Hills is in Airshed B1."

The reasons for my support or oppostion are:
Airshed B1 is struggling to meet the national clean air standards and no further wood burners can be allowed in this airshed, whether on the hill or on flat land. Pollution is pollution whichever part of the airshed it originates from. I live in Maire Street and can state from experience that prior to the current restrictions, air pollution in this area made life unpleasant and unhealthy.

I seek the following decision *:
Do not allow woodburners in any part of Airshed B1.

Further submisions on Plan Change A3 (Woodburners)

Further Submitter Details

Full Name *
Charmian Koed
Organisation

Contact Person

Address for Service *
5 Maire Street
Nelson 7011
Primary Phone *
5486658
Secondary Phone

Email * koed@extra.co.nz

Council Hearing

Please select...

I / we DO NOT wish to be heard in support of my/our further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we represent a relevant aspect of the public interest

Further Submission

Please select...

I support the Submission of:

Submission Number *
87
Name of the submitter *
Peter Burton and Ed Kiddle, Nelson Marlborough District Health Board Public Health Service
Address of the submitter *
c/- Angela Lenz, NMDHB Public Health Service, 281 Queen Street, Richmond 7020

The particular parts of the submission I support or oppose are *:

87.2

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).

87.4

Good air quality should not be compromised at the expense of heating cold homes and therefore other initiatives, such as improving thermal efficiency of homes, are important. It is very important that NCC continues to support initiatives to address cold homes and associated health effects alongside improving air pollution."

The reasons for my support or oppostion are:

87.2

It is important that NCC commits long term funding to the behaviour change programme to ensure it continues.

87.4

Cold homes also have health effects, and it is important that this issue is addressed alongside improving air quality.

I seek the following decision *:

87.2

Set out how the behaviour change and monitoring programme itself will be routinely monitored, evaluated and reviewed.

Set out the ongoing operational costs of implementing the programme over the life of the (reviewed) Nelson Air Quality Plan.

NCC must commit long term funding to ensure the programme's continuation.

87.4

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

Tessa Golding

From: Submissions
Sent: Friday, 18 March 2016 4:24 p.m.
To: Administration Support
Subject: FW: Further submission on Plan Change A3 Woodburners

Categories: LATE Woodburner Survey

From: Council Enquiries (Enquiry)
Sent: Friday, March 18, 2016 4:24:15 PM
To: Submissions
Subject: Further submission on Plan Change A3 Woodburners
Auto forwarded by a Rule

Further Submitter Details
Full Name *

Peter Olorenshaw

Organisation

Nelson Woodburner Group

Contact Person

Peter Olorenshaw

Address for Service *

10 Ralphine Way Maitai Valley
Nelson

Primary Phone *

035466176

Secondary Phone

035466176

Email *

petero@inspire.net.nz

Council Hearing
EditableRadioField6312
Please select...

I / we wish to be heard in support of my/our further submission

Eligibility
Please confirm you satisfy at least one of the below RMA eligibility criteria for making a further submission

I/we represent a relevant aspect of the public interest, I/we have an interest in the proposal that is greater than the interest of the general public

Further Submission
Please select...

I oppose the Submission of:

Submission Number *

1

Name of the submitter *

Bill Brett

Address of the submitter *

43 Brook St Nelson

The particular parts of the submission I support or oppose are *:

please see the separate email with all the submissions we support and oppose and the reasons for that

The reasons for my support or oppostion are:

please see the separate email with all the submissions we support and oppose and the reasons for that

I seek the following decision *:

1. 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 our original submission), allow them in any house there)

2. 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.

EditableLiteralField6331

FURTHER 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 further submission

Eligibility

1 We represent a relevant aspect of the public interest
2 We have an interest in the proposal that is greater than the interest of the general public

Responses to the Majority of Submitters:

A number of people have asked to retain the plan change while they want to allow NES compliant burners instead or as well as ULEB's. It would seem they are unaware that the plan change proposes only to allow ULEB's. The panel reviewing the submissions should take this into account- very few people specifically want ULEB's: if people are given the choice many couldn't afford the extra $1000's for the ULEBs even if they wanted them. Most people want NESAQ clean air compliant burners, not ULEB's.
We support all submitters who want more NESAQ compliant burners to be allowed in Nelson airsheds.

We Oppose the following Submitters for the following reasons:

#1 Bill Brett
Its the dirty burning that is the issue, Bill should report this to NCC, so the burner operators can be taught how to burn cleanly and warned not to do it again. Its the smoke that is the issue, anybody can make an NES compliant burner smoke by throwing an armful of wet wood into the firebox and damping it down.

#9 Jean Edwards
This is nonsensical - unless Tahuna hills residents are above the inversion layer their smoke will be making the air below worse: the readings need to be taken in the worst place i.e. on the flat.
#15 Juliet Westbury
We see it as not an either or issue. You can have low levels of air pollution whilst allowing more logburners in provided there is a behavioral change to making a smoky fire as socially unacceptable as smoking a cigarette in a restaurant. We are asking for a change in council thinking from banning burners to banning smoke. We think NCC have been very poor in actively policing the no smoky chimney policy and this needs to change.
Secondly the facts actually are that respiratory admissions have increased by a 1/4 while particulates have decreased by 2/3 in every airshed. PM10 particulates appear to have less effects on respiratory illness than cold damp homes. From “facts on the ground”, there is no case for continued banning of logburners.
I’m an architect, I’ve personally insulated and attempted to draught-proof old drafty villas and although these measures are a help, these houses will never be as warm and airtight as new houses. For one thing, it is rare that walls are insulated: How warm are you in winter with a warm hat and warm boots, but nothing around your body? Insulation does not heat a cold house. These houses are always going to require substantial amounts of heat which is uneconomic to provide by electricity: 1/3 of peoples wood is free, electric heating is never free. A typical log burner is rated at 20-25kW heat output: this is the equivalent of 10-12 two bar electric heaters or 4 to 5 heat-pumps.
We need to let more logburners in so that poor people can afford the heat that their old villas need and at the same time start actively policing the no smoke policy.

#19 Joe Burkow
Lowering PM10’s has not delivered according to DHB statistics - as noted above, PM10’s down by 2/3, yet hospital admissions increased not decreased, and not by a small amount they have increased by 1/4 over the same time period - 13 years. By banning burners rather than actively banning smoke, NCC has made people sicker. Cold damp houses and fuel poverty with having to buy electric heating has resulted in worse health incomes. Our wood particulates are not the same as European fossil fuel particulates, the health outcomes from each should not be treated the same.

#31 Ann Allen
As above and The plan change you wish to delete actually aims to deliver an 'improvement' (reduction in PM10) to Nelson's air quality or cleaner air.

#37 Claire Newcombe
As above

#32 Thomas Koed
The council is not "changing the regulations to increase air pollutant loading". As an opening statement this is totally incorrect. The council is proposing a change which will reduce PM10. We believe failing to implement a behaviour change programme is ultimately what will "undermine continuing improvement in air quality" By rejecting this plan change you are rejecting a chance for Nelson to accelerate even further reductions in PM10.
Particulate levels being decreased by 2/3 in every airshed has resulted in an increase of hospital admissions by 25% - our wood smoke dominated particulate pollution is completely different to the fossil fuel derived particulate pollution in Europe that health

effects are assumed to be the same as. What makes you think depriving people of free heat for their homes will increase their health? It certainly hasn't in the last 13 years. See above re insulation of old drafty villas being impossible to get anywhere near new house standards.

#63 Charmain Koed
as above
and
Disagree that we should wait until effective policing is in place before allowing more logburners in: We can and should do both together - peoples health has suffered for 13 years with cold damp houses, they shouldn't have to wait another year before being allowed the only effective heat source for low income earners in old houses.

#65 and 66 Eurocell & Southpine
Are arguing that the right for people to warm themselves in their own homes should not come before industrial polluters. We think this is wrong. Fundamentally people in their homes should come first, not industrial profits.

#67 John (Brent) Higgins
We agree with this - ecoflue kits should become the standard and flues that use room air for flue cooling should be banned from new and replacement installations.

#78 Sue Alsop, Nelson Asthma Society
Seems to be unaware that the PM10 reductions have made respiratory admissions increase due to the increase of cold damp houses. Cold and Damp seems to have a greater effect on health than woodsmoke particulates in NZ: Our particulates are of completely different chemical composition and probably size distribution than European particulates that are predominantly fossil fuel derived.

#95 Inga Smidt
Disagree that we should wait until effective policing is in place before allowing more logburners in: We can and should do both together - peoples health has suffered for 13 years with cold damp houses, they shouldn't have to wait another year before being allowed the only effective heat source for low income earners in old houses.

#87 Peter Burton and Ed Kiddle for NMDHB
We are disappointed that Ed Kiddle who has met with us and told us personally that standing up for the most vulnerable in our society - our children - has taken a position to support a proposal that fails to do just that. DHB support for the more expensive and low powered ULEB's, over the cheaper NES compliant burners that are more powerful is reprehensible. It is the low income earners who really need these effective powerful burners and they are ones who will be least likely to be able to afford one. ULEB's are a non solution to fuel poverty that is causing the 25% increase NMDHB respiratory illness statistics

87.2 Actively policing smoking chimneys is ignored here by the DHB, yet this is the heart of the issue. Anybody can make a compliant woodburner smoke by throwing on an armful of wet wood and damping it down: It is a policing as well as an education issue.

87.3 Disagree that Nelson should strive to be below the NES on AQ as it has been shown to be a crock. NZ woodsmoke dominated particulates are not the same as European fossil fuel dominated particulates, eg just looking at the PAH adsorbed to the particulates shows fossil fuel particulates are a factor of 10 worse, yet they are treated the same in the NESAQ.

The DHB say there is no safe level of PM10 without considering what the PM10 makeup is. Does the DHB really think that one 10micron particle of salt is as dangerous as 1000 ultra-fine particles of diesel particulates? The measure of PM10 does not distinguish between these two scenarios. This is poor science and a disgrace coming from the DHB. Whilst the DHB acknowledge that cold damp homes have bad health effects, they fail in their duty of care for the population's health by ignoring the "facts on the ground" of their own worsening respiratory health statistics. They need to read the multiple submissions from people who can't afford to heat their house electrically.

#92 Ministry of Education
Fundamentally disagree with this as the evidence from the DHB is that our health has got worse since we cleaned up the air. We are not suggesting going back to smoky fires - most of these have been taken out, what remains is a behavioral issue. Delaying allowing poor people, the only effective heating source for their old drafty villas is not to their health benefit as the DHB stats show.
We find that the Ministry of Education's statement that our Council has insufficient data is a weak argument to delay change. Nelson City Council has been monitoring smoke levels in Nelson since 1983; that's 32 years. http://nelson.govt.nz/assets/Our-council/Downloads/state-of-the-environment-report-2010.pdf
Airshed C in Nelson is described by Richard Frizzell (Environmental Programmes Officer for NCC): "The common characteristic of Airshed C is that it has sufficient air drainage created by flow out of the valleys and coastal breezes to disperse air pollutants which prevents high concentrations occurring."
The only argument for delaying change in this airshed for example would be if the topography of Airshed C might suddenly change.
Further, it is inconsistent and objectionable for the Ministry to vouch for our children to be warm in their classrooms yet not at home.

#96 Hubert Altenburg
Effectively enforcing clean burning is what has been missing. We need council staff proactively driving around the streets on cold winter nights looking for smoky chimneys rather than waiting for complaints as they do now. We need to make having a smokey chimney as socially unacceptable as cigarette smoking in a restaurant. Otherwise we are left with people getting sicker in their cold damp houses.

#98 McCashin's Brewery
Disagree with them being allowed to burn coal with impunity- it is these fossil fuel particulates that have the bad health impact the Europeans have found. They should not be counted as the same as woodsmoke particulates. Coal burning needs to become a discretionary activity and progressively wound back to being outlawed completely.
98.2 agree as long it is wood-burning, not coal

#101 Mary Wilson
Her fears are unfounded, Nelson's air quality will not return to the "bad old days" for the following reasons:
Outside burnoffs have been outlawed, including incinerators
Open fireplaces are not going to be reinstated
Most old inefficient and smokey wood-burners have been replaced. And when people replace their burners its inevitably with a cleaner burning one
Many houses now have heat pumps as well as a (sometimes non compliant) logburner. If these people are allowed to replace their logburner with a new one, they won't be lighting

it al the time - e.g. most will just use the heat-pump in the morning and only fire up the logburner at night.
Many houses have had some ceiling and underfloor insulation installed and although this in no way brings them anywhere near a new-house standard of insulation, it will reduce the extent of heating required
Active rather than reactive enforcement of clean air burning, combined with a behavioral change programme making a smokey chimney socially unacceptable.

#103 Derek Shaw Nelson Environment Centre
We are disappointed that the NEC has not taken an evidence based approach to its recommendations. Surely they can not be unaware that hospital admissions for respiratory illness have increased in Nelson since the burner ban. We've had 13 years of evidence now, the air is cleaner but people are colder and sicker.
We are disappointed the NEC does not take into account climate change issues of constricting logburners: logburners are greenhouse gas neutral whereas 30% of our electricity supply is not. Nelson's electricity may be predominantly hydro, but at the time when we most need heat - early winter evenings, the grid is struggling to provide enough electricity and fossil fuels are burnt to make up the difference. People in Nelson using electricity to heat their homes are using electricity that might otherwise of been sent to the North island. And because the North islanders aren't getting that hydro power, more fossil fuels being burnt.

103.3 We disagree with this part of this submission for the following reasons:

We disagree that a 10% behavioural change will be difficult to achieve: active enforcement has not occurred before. A member of our group seemed to be the only one last winter contacting NCC to get enforcement officers out to see the smokey chimneys.

And the Nelson Environment Centre seem to be unaware that the huge reduction in particulates we have seen, have delivered worse, not better, health outcomes.

We Seek the following decisions:
1. **Request Change from ULEBs every house in just Airsheds B2 & C to NES burners in <u>Old</u> Houses in <u>All</u> Airsheds** (except in the new airshed D (see our original submission), allow them in <u>any</u> house there)

2. **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.

END

RMA Further Submission Form in support of, or in opposition to, submission on publicly notified proposed plan change or variation

Nelson City Council
te kaunihera o whakatū

Return your submission by **5pm 18 March 2016** to:

Administration Support
RMA Plan Change Further 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 "Woodburner Plan Change" in subject line)

OFFICE USE
Further Submission No:

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

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

Further Submitter Details

Full Name	PETER BURTON & DR ED KIDDLE		
Organisation	NELSON MARLBOROUGH DISTRICT HEALTH BOARD PUBLIC HEALTH SERVICE		
Contact Person	ANGELA LENZ		
Address for Service	PO BOX 647	Business Phone	(03) 543 7805
	NELSON	Home Phone	
		Mobile Phone	
Email	angela.lenz@nmdhb.govt.nz		

Council Hearing

I/we ☑ wish to be heard **(OR)** ☐ do not wish to be heard in support of my/our further submission

☐ *(If wishing to be heard)* I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a Further Submission:

☑ I/we represent a relevant aspect of the public interest

☑ I/we have an interest in the proposal that is greater than the interest of the general public.

Public information

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I support/oppose the Submission of:
(Delete as appropriate)

Submission Number:	35, 97 & 99
Enter the **NAME** of the submitter	DAN McGUIRE, TIM SKINNER, NEVILLE MALE
Enter the **ADDRESS** of the submitter	45 DOMETT ST NELSON 2 BROOK TCE NELSON 9 ROSEBANK TCE STOKE NELSON

The particular parts of the submission I support/oppose are:
(Delete as appropriate)

Please refer to attached letter

The reasons for my support/opposition are:
(Delete as appropriate)

I seek the following decision:

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

21/3/16
Date

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).

Submission F14

TE WAI ORA
Nelson Marlborough District Health Board

Public Health Service

PO Box 647, Nelson 7040
Phone: (03) 546 1537
Fax: (03) 546 1542

PO Box 46, Blenheim 7240
Phone: (03) 520 9914
Fax: (03) 546 1542

18 February 2016

Administration Support (RMA Plan Change)
Nelson City Council
PO Box 645
Nelson 7040

For your information: Submissions on Nelson City Council Air Quality Plan Proposed Plan Change A3 (the Wood Burner Plan Change) raising the matter of increased hospital admissions

The Nelson Marlborough District Health Board Public Health Service (NMDHB-PHS) notes that several submissions on Plan Change A3 (Submitter Numbers 35, 97 and 99) make statements which link hospital admissions for respiratory disease in Nelson to wood burner restrictions.

The NMDHB-PHS would like to draw the Hearing Committee's attention to a report by Dr Ed Kiddle[1], on the Nelson City Council (NCC) website in relation to Plan Change A3, which addresses this very issue.

The report discusses the findings of an analysis by NMDHB-PHS on seasonal variation in admissions to hospital for respiratory disease. In summary, the report notes:

- despite an overall improvement in local air quality the overall trend in the number of hospital admissions for respiratory disease in Nelson Marlborough has not decreased
- this trend may be explained by changing demographic and socio-economic factors such as an ageing population and lower use of primary care due to economic constraints (e.g. less likelihood of doctor's visits to intervene before hospitalisation is required), alongside other contributing factors such as housing quality and year to year variations in the incidence of circulating viruses such as influenza.

The NMDHB-PHS would like to highlight that because there are multiple causal factors it is difficult to quantify the attributable component for each factor. Notwithstanding this, a study by Emily Wilton[2] for the NCC found that it is unlikely that there has been an increase in cold homes since high emission wood burners were phased out.

It would be a very negative step to take the lack of a fall in respiratory admissions to hospital over the period 1999 - 2013 as a reason to relax air quality rules and permit greater air pollution particularly as these effects often do not become apparent for many years.

The Royal College of Physicians in the UK recently released a report titled '*Every breath we take: The lifelong impact of air pollution*' and to quote from the executive summary:

> "*Air pollution plays a role in many of the major health challenges of our day and has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity and changes linked to dementia.*

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[1] Kiddle E. 2014. *NCC Air Quality Plan – possible changes for wood burner rules: A discussion paper on adverse health effects related to poor air quality and cold houses.* Richmond: Nelson Marlborough District Health Board Public Health Service

[2] Wilton E. 2015. *Potential impacts of management measures: Heating, household and fuel poverty data for Nelson 2014.* Envirolink Report NCC089. Prepared for Nelson City Council. Christchurch: Environet Ltd

Neither the concentration limits set by government, nor the World Health Organization's air quality guidelines, define levels of exposure that are entirely safe for the whole population.

...This damage occurs across a lifetime, from a baby's first weeks in the womb all the way through to the years of older age"[3]

The NMDHB-PHS notes that there is a strong relationship between poor air quality, adverse health impacts and increased hospital admissions.[4] Accordingly, work to improve and maintain local air quality (amongst other activities such as addressing cold homes) needs to be ongoing.

Yours sincerely

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

[3] Royal College of Physicians. 2016. *Every breath we take: The lifelong impact of air pollution*. Report of a working party. London: Royal College of Physicians

[4] Ministry for the Environment & Statistics New Zealand. 2015. *New Zealand's environmental reporting series: Environment Aotearoa 2015*. Wellington: Ministry for the Environment & Statistics New Zealand

RMA Further Submission Form in support of, or in opposition to, submission on publicly notified proposed plan change or variation

Nelson City Council
te kaunihera o whakatū

F16
XXXXXX
Submission F15

Return your submission by **5pm 18 March 2016** to:

Administration Support
RMA Plan Change Further Submissions
Nelson City Council
PO Box 645
Nelson 7040

OFFICE USE
Further Submission No:

RECEIVED
18 MAR 2016
NELSON CITY COUNCIL
Customer Services

(Hand delivery or Courier to: Ground Floor, Civic House, 110 Trafalgar St, Nelson 7010 or Email to: submissions@ncc.govt.nz with "Woodburner Plan Change" in subject line)

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

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

Further Submitter Details

Full Name	Deborah Barr		
Organisation	—		
Contact Person	—		
Address for Service	40 Poynters Cres	Business Phone	
		Home Phone	
	Stepneywaite	Mobile Phone	021029987
Email	do jane.barr@gmail.com		

Council Hearing

I/we ☐ wish to be heard **(OR)** ☑ do not wish to be heard in support of my/our further submission

☑ ***(If wishing to be heard)*** I/we would be prepared to consider presenting a joint case with others who have made a similar further submission

Eligibility

Please confirm you satisfy at least one of the below RMA eligibility criteria for making a Further Submission:

☑ I/we represent a relevant aspect of the public interest

☐ I/we have an interest in the proposal that is greater than the interest of the general public.

Public information

Please note that your further submission is required to be made publicly available under the Resource Management Act 1991, as it is part of the record of the public consultation process.

Important note:

You *must* send a copy of this 'further submission' to the person who made the original submission within 5 working days of sending this further submission form to the Nelson City Council.

Submitter addresses are listed on the Index of Submitters within the Summary of Decisions Requested document available at the Council, libraries or online at www.nelsoncitycouncil.co.nz (search: Woodburner Plan Change).

I support/~~oppose~~ the Submission of:
(Delete as appropriate)

Submission Number:	2
Enter the **NAME** of the submitter	Thorkild Hansen
Enter the **ADDRESS** of the submitter	25 Poynters Cres Stepheville.

The particular parts of the submission I support/~~oppose~~ are:
(Delete as appropriate)

how emission fire places, solar power and hot water can all work together to improve the standard of living for all Nelson residents, now and for future generations.

The reasons for my support/~~opposition~~ are:
(Delete as appropriate)

I wish to be considered to install a clean air woodburner to heat our home.

I seek the following decision:

To be able to install a clean woodburner in Airshed C (Poynters Cres)

Deborah J Be
Signature of Further Submitter
(or person authorised to sign on behalf of submitter)

18 March 2016
Date

Please print further copies of page 2 for additional submissions as required (sign all and attach to page 1).