

NELSON CITY COUNCIL

Nelson Air Quality Plan

Proposed Plan Change A3
Wood Burners

Summary of Decisions Requested

5 March 2016



Introduction

This document contains a summary of decisions requested by persons making submissions on the Nelson Air Quality Plan, Proposed Plan Change A3 (Wood Burners).

In total 108 submissions were received. This summary is provided in accordance with the requirements of Schedule 1, Clause 7, public notice of submissions, Resource Management Act 1991 (RMA).

Actual submissions

The actual submissions should be referred to for a full understanding of the particular points raised by each submitter. These are available on the Council website (www.nelson.govt.nz), in the Council's Customer Service Centre and in Nelson libraries.

Further Submissions

Further submissions are invited and may be made in accordance with Schedule 1, Clause 8, Clause 8A and Form 6 of the RMA. A guide to making a further submission is included on the following page. A further submission form is available to ensure your further submission meets the RMA's requirements.

Closing Date

The closing date for further submissions is 5pm, Friday 18 March 2016.

Contact Person

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Guide to Making a Further Submission

Important Information:

- Any person representing a relevant aspect of the public interest, or who has a greater interest than the general public, can make a further submission.
- A further submission may only be made in support of, or in opposition to an original submission to Proposed Plan Change A3.
- A further submission must state whether you support or oppose an original submission (or part thereof) and whether or not you wish to be heard on your further submission.
- A copy of your further submission must be sent to the original submitter to which your further submission relates, within five working days of making your further submission to the Nelson City Council.
- Further submissions must be received by Nelson City Council by 5pm on Friday, 18 March 2016.

The Summary of Decisions Requested document summarises the decisions which were requested in the original submissions. It also includes a summary of the submission details. However, if you intend to make a further submission, we recommend you read the full original submission.

Full copies of all submissions are available for viewing online at www.nelson.govt.nz search phrase 'Woodburner Plan Change', the Council Customer Service Centre and at Nelson, Tahunanui and Stoke Libraries. Further submission forms are also available online, and at these physical locations.

When preparing your further submission, please use the **Submission Statement Number** provided in the following tables to indicate which statement you are commenting on, and clearly state whether you support or oppose the decision requested. Give the reasons for your support or opposition.

Use the **Further Submission Form** to help set out your further submission. It is in your best interests to make your further submission as clear as possible. If you have any questions regarding how to prepare a further submission, please contact Chantel de Ru on 03 265 6930.

One copy of the further submission must be sent to Council and a second copy must be sent to the original submitter within five working days of providing Council with the further submission. The postal addresses of the submitters are provided at the end of this document.

A) Summary of Decisions Requested – in submitter order

Proposed Plan Change A3 (Wood Burners)

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
1	Bill Brett	1.1	Support for the proposed changes, but there is still a need to eliminate dirty burners. Two near neighbours operate burners that belch dirty smoke non-stop for four to five months of the year. Air quality monitoring taken in the vicinity would certainly fail to meet standards.	Approve the plan change and improve Council's enforcement functions.
2	Thorkild Hansen	2.1	It is important to provide the ability for householders to heat their homes efficiently using renewable resources. Many Nelson households have access to wood. Given our aging population, it makes sense to enable long term and economically viable heating solutions. Low emission fire places, solar power and hot water can all work together to improve the standard of living for Nelson residents, now and for future generations.	Amend plan change to allow ultra low emission burning appliances to be installed in all zones in Nelson, for retrofitting and in new houses.
3	Katharine Day	3.1	Heat pumps do not provide adequate warmth. Provide ability to reinstall a low emission burner.	Retain Plan Change.
4	Cole Ryan	4.1	The ability to heat homes with firewood is a right that should not have been removed even if it affects air quality.	Permit low emission wood fires.
5	Brandon Freiberg	5.1	Heat pumps are not as efficient as woodburners, and cause dry/sore throats in winter.	Amend the plan change to allow for any low emission burners that can meet the (NES) requirement of less than 1.5 grams per kg of fuel burnt.

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6	Alan Thornborough	6.1	Preference for woodburners to keep warm in winter.	Not specified.
7	Jane Murray	7.1	A broader range of fires in lower range prices should be available, so consumers can choose either a ULEB or NES burner. The cost of ULEB will be prohibitive for some, but a better option than not being able to install a woodburner at all.	Retain Plan Change.
8	Samantha Hart and Nathan Carmody	8.1	Heat pumps are expensive to run and only heat one room. Our family gets sick often in winter due to being cold.	Amend the Plan Change by deleting AQr.26A and replacing it with a rule that enables any low emission burner that falls under current emission percentages to be installed
9	Jean Edwards	9.1	Opposed to the method of monitoring Airshed B1, which does not distinguish between readings on the Tahunanui plains versus the Tahunanui hills.	Amend AQ2B.3.4, Airshed B1, Step 1 to read: "Identify days between May and August inclusive which have nine or more hours of average hourly temperatures less than five degree Celsius. Take the average of PM10 concentrations on days that meet this criterion for each year, <u>both in the coastal plain area and on a specified height on the Tahunanui Hills.</u> Note that the analysis can only be undertaken if valid data for the period May - August (all meteorological conditions) exceeds 75%."

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10	Graham and Jennifer St John	10.1	Heat pumps don't sufficiently heat homes and are extremely expensive to run. My children are cold.	Retain Plan Change.
11	Simon Hall	11.1	ULEBs are expensive and limited in design and choice. People are disadvantaged if they aren't allowed to install a woodburner, while their neighbours can still use theirs.	Amend the Plan Change to allow both ULEBs and NES compliant burners.
12	Joanna Cranness	12.1	I would like to be able to install a log burner in my rental house as the tenants say the heat pump doesn't heat the house properly in winter.	Retain Plan Change.
13	Tony Healey	13.1	This is a sensible approach.	Retain Plan Change.
14	David McNicoll	14.1	Ultra low emission burners are too expensive for the average person interested in using a woodburner as an economic method of heating.	Amend rule AQr.26A to allow installation of NES compliant woodburners.

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15	Juliet Westbury	15.1	<p>Air quality has improved significantly in winter time, but it is still poor in some areas including the Brook, North Road, Washington, Toi Toi and Stoke areas. I suffer from asthma (in a minor way compared to many) and fires impact on my ability to bike to and from work, mountain bike up the Brook, or at football training in the evening. I am unable to dry my washing outside in winter because I can't get home by 4pm when the fires start. Individual residents shouldn't be allowed to have such an impact on their neighbours and others wanting to be active outdoors. A new industry wouldn't be able to have a discharge beyond the boundary of their property that had more than a minor impact so I don't understand why residential dwellings are permitted to do this.</p> <p>People should be encouraged to upgrade their insulation to today's standards before allowing even a ULEB, as they might find they don't need it. Instead of installing a woodburner I insulated my 1950s house and haven't regretted it.</p>	Delete entire Plan Change.

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16	Paula Nairn	16.1	<p>Old houses in Nelson do not heat well with heat pumps, and heat pumps cost too much to run in winter. Also, the colder it is the longer it takes to heat up and the more power is used.</p> <p>The poorer areas of Nelson are the ones who actually need the woodburners more, yet they are not allowed, and they cannot afford to heat their home with heat pumps, and most landlords do not allow gas heaters.</p> <p>More focus should be on burning dry wood and not rubbish, as that is what causes most of the smoke.</p>	Allow more woodburners to be installed in homes, and focus on education about burning dry untreated wood. Consider employing someone to test the moisture content of people's wood, and making it easier for people to collect wood from Council areas, or easier to access wood in forestry blocks after logging.
17	Kelly Short	17.1	<p>My power bill is almost four times more in winter than in summer, and I still find the house cold and damp. A woodburner will ensure the house is warmer and drier as well as the cost of fuel being a lot cheaper than both a gas fire and heat pump.</p>	Retain Plan Change.
18	Rebecca McCulloch	18.1	<p>Lower income areas such as Airshed A need the option of installing a woodburner first, rather than later. If this doesn't happen people will be forced to use electric or dangerous heating, which is not adequate for damp, cold households. These houses have poor heating and the people are disadvantaged, low income earners. Having unsuitable heating in these homes leads to higher health bills and unsafe homes.</p>	Amend the plan change to enable people in Airshed A to install burners before other airsheds.
19	Joe Berkow	19.1	<p>Keep emissions in Nelson as low as possible.</p>	Delete Plan Change entirely.
20	Shane L Haydon	20.1	<p>People have a right to heat their homes from renewable energy sources that are locally sourced, and to not be reliant on electricity and gas companies for heating.</p>	Retain Plan Change.

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21	Felicity Watson	21.1	I've moved to a house without a woodburner. Heat pumps are ok for quick heat but not all day warmth. So many houses have changed hands, and many people would not choose a heat pump. I would be able to use a woodburner to keep my kids warm by heating my whole home, and to have heating even during a power cut. I would like to install a woodburner and pay it off through my rates.	Retain Plan Change.
22	Peter Taylor	22.1	<p>The provision for only very expensive ULEBs disadvantages people who can't afford them, so potentially won't help the people who most need better home heating.</p> <p>As the major factor contributing to PM10 is the moisture content of the wood being burned, it should be feasible to allow NES compliant burners (which includes ULEBs). Combine this with education around best practice for buying, storing and burning dry wood, so more people would be able to install a new NES burner to keep warm, without further degradation of our air quality.</p> <p>Alternatively, allow a smaller number of NES compliant burners to be installed to improve people's ability to finance their installation. Take a conservative approach to the number of new NES wood burners allowed, and review this every 1-2 years, adjusting the number upwards if PM10 levels are held at acceptable levels.</p> <p>The proposed rule will only assist the wealthy to keep warm and it would be better to encourage them to invest in heat pumps, not new fires.</p>	Amend the Plan Change to enable up to 300 new NES compliant woodburners between 2016 and 2019, provided ambient PM10 levels remain within the NES Air Quality rules.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
23	Carlo Wiegand	23.1	There is much need for affordable and sustainable space heating in all of Nelson's airsheds.	Amend the Plan Change to allow small numbers of ultra low emission burners to be installed in airsheds A, B1 and C.
24	Jennifer Witchlow	24.1	Woodburners are now very efficient in respect of their emissions. Limiting woodburner discharge permits to five years would ensure the most efficient and lowest emission burners were the standard stock in Nelson, providing ongoing protection of air quality.	<ol style="list-style-type: none"> 1. Make woodburner permits available to people who don't currently have a woodburner permit. 2. Limit permits for discharges from woodburners to a five year period, with a requirement to reapply. This time limit should apply to all woodburner permits, not just new ones being issued in future.
25	Penny Adlington	25.1	Heat pumps do not always heat homes efficiently and are costly to run. Having the choice to turn on a heat pump or light a fire is preferable.	Retain Plan Change.
26	Andrew Murray - t/a McCashin's Brewery	26.1	The company seeks assurance from NCC that any proposed changes to the Nelson Air Quality Plan as a direct result of this plan change will not adversely impinge upon the air discharge conditions granted under their approved NCC resource consent.	Retain Plan Change, subject to the points raised in this submission.
27	Carol Glen	27.1	Everyone deserves the right to keep warm in winter with a wood fire.	Retain Plan Change.
28	Tom Kennedy	28.1	The Plan Change will help households on fixed low incomes to heat their homes during the winter, now that electricity costs have increased so much over the last few years.	Retain Plan Change.

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29	Mary Sullivan	29.1	The proposals do not balance human health risks appropriately. The options available are unaffordable for the majority of homeowners who would benefit from a woodburner.	Delete Rule AQr.26A and replace it [and other parts of the plan change] as follows: Real-life testing of other affordable burners (under \$3000) that show very low emissions, eg Pyroclassic IV
29	Mary Sullivan	29.2	The proposals do not include any other low emission burners that have very low emissions, eg Pyroclassic IV.	Allow low emission burners with emissions of 0.3g/m ² or less.
29	Mary Sullivan	29.3	The options do not include a wetback option, which would allow for increased energy savings.	Inclusion of a wetback model
29	Mary Sullivan	29.4	The proposals do not include any allowance for woodburners in Airsheds A and B1, which are often the areas where Nelson's most deprived households live.	Allow 1000 new burners each in airsheds B2 and C, and 500 new burners in airsheds A and B1.
29	Mary Sullivan	29.5	The proposals do not balance human health risks appropriately. The options available are unaffordable for the majority of homeowners who would benefit from a woodburner.	Carry out a major education campaign on good wood use.
29	Mary Sullivan	29.6	The proposals do not balance human health risks appropriately. The options available are unaffordable for the majority of homeowners who would benefit from a woodburner.	Review this policy every three years.

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29	Mary Sullivan	29.7	<p>The current proposal limits installation of woodburners to four very expensive options, none of which includes a wetback. This severely limits the numbers of people either able to afford one of these options, or who wish to use a wetback to achieve further energy savings.</p> <p>There are a number of other low emission burners that do not exceed 0.5g/kg. For example the Pyroclassic IV burns only 0.3g/kg.</p>	If the limitation [on approving other woodburners] is that the Pyroclassic IV and other similar fires have not been tested under real life conditions, then please do this testing.
29	Mary Sullivan	29.8	I have worked extensively with the refugee community and struggling families and can give numerous examples of families with frequent admission to hospital or being unreasonably medicated due to living in damp and cold houses. These people have heat pumps but do not use them as they cannot afford the electricity bills. They go to bed to keep warm, but are still breathing in cold air which is often damp and containing dangerous mould spores.	Give more consideration to the health impacts on deprived households who are living in cold, damp houses, and are unable to afford the electricity costs of running heat pumps.
30	Chris Myers	30.1	Households on low incomes should be able to heat their homes, especially with electricity being so expensive now.	Retain Plan Change.
31	Anne Allen	31.1	Opposed to ANY deterioration in Nelson's air quality. Even ultra low emission burners still depend upon users burning dry wood, and it has already been proven that not everybody does use dry wood.	Delete Plan Change entirely.

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32	Thomas Koed	32.1	<p>The Council should not change the regulations to allow increased air pollutant loading. This undermines continuing improvement of air quality and therefore does not implement the intentions of the Air Quality Plan and the Council's obligations.</p> <p>Allowing a limited number of woodburners to be installed is inequitable. Permitted activities must be universally permitted and banned activities must be universally banned, except where individual circumstances are exceptional (ie. not on a first-in, first-served basis).</p> <p>The Plan Change will not address the issues of the living conditions, housing and health of the less affluent members of the community. The types of approved woodburners are unaffordable for the poor. Those in rental accommodation would be unlikely to benefit as landlords would be unlikely to install expensive new burners.</p> <p>Consider other mechanisms to address the living conditions, housing and health of the less affluent. For example,</p> <ul style="list-style-type: none"> - programmes to encourage and subsidise insulation - warrants of fitness/minimum standards for rental accommodation - rates rebates for the installation of efficient electric heating systems - lobbying central government for regulatory alteration of electricity pricing mechanisms. 	Reject Plan Change.

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33	David James	33.1	ULEB will provide efficient and cost effective heating compared to heat pumps. A ULEB will increase our ability to adequately heat our home.	Retain Plan Change.
34	Clare Monti	34.1	<p>Woodburners should be accessible for all people as it is one of the best ways to thoroughly heat a house (as opposed to an air pump which only heats the air).</p> <p>Low income people should be able to have woodburners in their homes, as firewood can often be collected for free, so they are not at the mercy of power companies' ever increasing prices.</p> <p>It would be illogical to enable a new road through the Railway Reserve for air quality reasons if woodburners are not allowed city-wide.</p>	Amend AQr.26A to also allow woodburners in Victory Square.

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35	Dan McGuire	35.1	<p>NES compliant burners are approved, proven and readily available. They are extremely efficient, clean burners.</p> <p>ULEBs are very expensive and are unproven technology. Many also require a 240V electrical connection to function. Nobody in the community has asked for them, and local fireplace distributors are not keen on them. Only one distributor in Nelson has the rights from the manufacturer to sell these ULEBs at present.</p> <p>The pellet burners were the same scenario 10 years ago, and on paper they sounded good as a new technology. However, in practice they proved ineffective for heating, were unreliable, and were also dependent on electricity. After a couple of years no one wanted these approved pellet burners. The risk is this may also be the case with ULEBs, as just a few have achieved this technology, and they have only been around for one season so far in Christchurch.</p>	Amend the Plan Change to enable NES compliant burners rather than exclusively allowing for ULEBs.

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35	Dan McGuire	35.2	Three options were evaluated in the staff report presented to Council in December 2015. Option 1 was recommended by staff, and was the most restrictive. This is the option that was preferred by the majority of Council. However, Option 3 is the most suitable option. It allows many more homes to have woodburners installed, with more areas in Nelson allowed to have them. It also achieves the current NES air quality standards, imposed by central government. Option 3 would enable the greatest benefit to home heating by allowing the largest number of woodburners to be installed.	Amend the plan change to adopt Option 3, as considered in the staff report presented to Council at the December 2015 Council meeting. This sets the allocation of burners at the maximum allowable to achieve the NES ambient air quality limits.

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35	Dan McGuire	35.3	<p>The very month when Nelson had the most restrictive home heating rules in NZ take effect, Nelson's respiratory illness by hospital admissions had deteriorated, which is a completely opposite trend to the rest of NZ's DHB figures.</p> <p>These health concerns due to the restriction of sensible, effective heating by clean efficient burners in Nelson are backed up by the NZ Asthma Society, many Nelson doctors, and many other health and building experts in the region.</p> <p>A highly qualified and respected air quality expert, Dr John Hoare, spoke to the Council's air quality working party last year, but his presentation was dismissed by Council staff.</p> <p>The NZ Parliamentary Commissioner for the Environment Dr Jan Wright has also recently written a report that condemns the methodology of air quality compliance used at present for exceedance levels in NZ. She states it is incorrect and has been superseded by current international understanding of the cause and effect of carbon particulate in the air.</p>	Amend the Plan Change to take into account Nelson hospital data, and DHB evaluations that show respiratory health has worsened since 2004, when the restrictive heating rules in the Nelson Air Quality Plan were enforced.

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36	Bev Webster	36.1	The ability for emissions to dissipate from Tahunanui Hills is much greater than for Tahunanui plains, due to the elevated position. Being grouped together in one airshed is a disadvantage for Tahunanui Hills residents in this situation.	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.
37	Claire Newcombe	37.1	Air pollution is still a problem in Nelson. Get rid of all woodburners, instead of allowing more.	Delete Plan Change entirely.
38	Bryan Banks	38.1	NES compliant woodburners need to be allowed as well as ULEBs, even if it means a reduced number of overall burners in Airshed C to compensate for the higher emissions from NES burners. The cost of a ULEB (\$7500 to \$12,500) is more than twice the cost of NES woodburners, and is excessive.	Amend the Plan Change to allow for NES compliant woodburners (as approved burners) in Airshed C.
39	Hazel Thelin	39.1	Support ability to install a ULEB to enable installation of a back up woodburner as an option, should the current heat pump system fail in future.	Retain Plan Change.
40	Albert Hutterd	40.1	This change enables ratepayers and residents to benefit from the warmth of renewable, locally available wood supplies, subject to being able to pay for the installation of a compliant woodburner.	Retain Plan Change.

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41	Helen Parry	41.1	My tenant in Tipahi St struggles to heat the house using a heat pump. Firewood can always be come by cheaply or at a low price in this region. Heating needs to be more affordable for all.	Retain Plan Change.
42	Floor van Lierop	42.1	As a resident of Victory I wish to have the choice to keep my family warm in winter without relying on electricity.	Retain Plan Change, but give residents the choice between NES and ULEB burners depending on their budget and personal situation.
43	Elizabeth Preest	43.1	Cost effective, reliable heating should be available for all. ULEB is too expensive for most households and they require a very specific wood length, limiting what can be used.	Amend the Plan Change to allow both NES and ULEB burners for existing properties.
44	Tony Karsten	44.1	Hundreds of dollars a month are currently spent in winter for power (heat pumps and column heaters). A woodburner would provide a cheaper, healthier form of heating as well as providing heat during power cuts.	Retain Plan Change.
45	Tom and Margaret Higgins	45.1	Woodburners are the only economic alternative to electricity, and Nelson only has limited supply lines of electricity. It also ensures houses can be heated during a power cut.	Retain Plan Change.
46	Anne Catherine Jones	46.1	Affordable heating for health of children and old people.	Retain Plan Change.
47	Lesley Brown	47.1	ULEBs are eco-friendly (burning renewable resources) and would enhance the heating in properties not benefiting from central heating, whilst minimising emissions.	Retain Plan Change.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
48	Adam Lloyd	48.1	The proposed Plan Change still restricts the basic right of people to have a fire. The benefits of having a fire outweigh any supposed environmental effects. The science behind atmospheric particulate analysis is deeply flawed.	Delete Plan Change and do not impose any restrictions on what type of fire people can have in their homes.
49	Adrian Secker	49.1	Woodburners are an economic form of heating, providing independence from reliance on an electrical supply and from high electricity prices. The Christchurch earthquakes showed the importance of heating autonomy.	Retain Plan Change.
50	Rob and Mary Stevenson	50.1	<p>Support the opportunity to install a ULEB as a wood burning fire is an environmentally friendly form of heating (carbon neutral), a low cost alternative, provides extra warmth on non sunny days in winter, and ensures emergency heating if electricity is unavailable. Fires provide more effective heat than other heating systems.</p> <p>It is a basic human right to be able to operate a fire within your own home. Now that certain fires have been proven to be low emission burners there is no reason why the Council can't grant residents permission to install these new types of fires.</p> <p>The clean air in Nelson over the past few years has been a great improvement.</p>	Retain Plan Change.

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51	Godfrey Watson	51.1	It is preferable to rely less on electric heating when no new power stations are planned to be built in NZ, and electricity costs are so high. Gas is limited as well. Emissions from modern fires are much less than older burners. There is a trade-off between discharges to air and the quality heating that woodburners provide. Generating electricity has environmental impacts as well, just not within Nelson - we also have a wider responsibility for the environment.	Retain Plan Change.
52	Turhan Djemal	52.1	<p>This plan change is a step in the right direction. More burners should be allowed in the Atawhai area because there have never been any smog or air quality issues (and no monitoring is done in this area).</p> <p>Preference for ULEBs rather than the less efficient NES burners - ULEBs are expensive but the price will come down as demand increases. Support for moving away from the term wood burner to 'ultra low 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.</p>	Retain Plan Change.
53	Gregory West	53.1	<p>The Plan Change denies people in Nelson the option of installing NES approved burners - whereas these are allowed in all other areas in NZ.</p> <p>The Plan Change is based on PM10 monitoring, but the Government is about to review the NES with a total change in focus.</p>	Amend the Plan Change to allow existing homes to replace with NES approved burners. In new homes allow ULEB and NES compliant burners in Airshed A/other airsheds.

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53	Gregory West	53.2	<p>The Plan Change fails to refer to PM2.5 and to WHO studies and recommendations. It also fails to refer to emerging technology. It fails to differentiate between benign PM10 (eg sea salt) and other forms. It also fails to identify and differentiate between industrial/traffic/other toxic PM10 particulate.</p> <p>The Plan Change does not provide details of behaviour change initiatives.</p>	<p>Allow a limited number of NES compliant burners in all airsheds. Allow ULEB in new houses (and accepted/approved new technology).</p> <p>Carry out clear, uncomplicated and proactive monitoring of burning practices.</p>
54	David and Robin Hall	54.1	<p>Support for the installation of approved, affordable low emission woodburners. This is an efficient, economical home heating method which has many health benefits. Seniors are more mobile in a warm environment. Chest conditions are less - saving on the health budget. It eases financial pressure from the electricity bills and could mean more money is available for food. Well fed children learn better.</p>	Retain AQR.26A.
55	Margot Souness	55.1	<p>As a family with young children living in a home built in the 1920s (in Airshed C), a woodburner would be a reliable and efficient source of heat. It has the added advantage of providing heat in a power cut or emergency situation.</p> <p>We would be eager to put our names on a waiting list for permission to install a ULEB in our area. The major downside for us would be the cost of purchasing and installing a ULEB. Our only option would be to borrow money - I'm sure others are in a similar situation.</p>	Retain AQR.26A.

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56	Lily Lo	56.1	<p>Significant ratepayer money was spent on removing woodburners. This money, and the gains made, look to be lost to a large extent by revisiting this issue.</p> <p>The measure of low emission woodburners is currently based on PM10 concentrations, by which the best low emission woodburners look okay. However, best practice internationally considers a range of particulate sizes as they have differing effects on health and the environment. Restricting woodburner discussion to just one measure ignores the wider effects of emissions and fails to take into account current best practice.</p> <p>Furthermore, allowance of woodburners condones an agreed or acceptable level of air pollution. While not fully opposed to this notion, it seems short-sighted to consider that this 'accepted level of pollution' should be consumed solely through the effect of woodburner use. Based on Council's published documentation, consideration only appears to have taken into account woodburner use for achieving the acceptable level of 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, there won't be meaningful debate on whether woodburners should be allowed.</p>	Delete the Plan Change entirely. Alternatively, more thoroughly consider whether woodburners provide the greatest community benefit for the level of air pollution induced, and provide air quality measures based on international best practice.

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57	Kate Russell	57.1	Allow people to install lower cost woodburners. Consider offering a discount on pellet burners for Victory residents because they are not allowed to install woodburners.	Amend the Plan Change to allow lower cost woodburners to be installed. Provide Victory residents with a discount on pellet burners.
58	Peter Wood	58.1	Woodburner restrictions appear to be unnecessary at the top of Orsman Crescent given the altitude of this area. The smog issues occur in an inversion layer between 50 and 80 metres which traps smoke, fuel and other emissions until the inversion breaks down. The woodburner emissions of residences above this level contribute less to this smog and would have minimal effects on Nelson's air quality.	Amend the Plan Change to allow NES compliant woodburners to be installed in areas which are 50 metres (or more) above sea level. Allow ULEB burners elsewhere, except in the odd location where katabatic wind flows meet, causing polluted air to be trapped for extended periods.
59	Emily Bolton	59.1	Our home lacks a woodburner and the home temperature falls well below world health standards in winter. It is only a matter of time before this affects our health. It is essential that this change is made. It appears extreme that clean air burning fireplaces cannot be installed due only to a timeframe. If the research had originally been based on each house that could take up the offer at the time and still provide an improved air quality, what is the reason for the time restriction to be in place? Homeowners should 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.	Retain Plan Change.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
60	Paul Young	60.1	I have scrim walls and am getting elderly (as are my tenants) so a woodburner keeps the house warm, and is beneficial for health reasons.	Retain the Plan Change, and approve a woodburner for my home.
61	Annabel Norman	61.1	People should have the choice to buy a NES or ULEB burner. The present cost of a ULEB burner is expensive, and affordable options should be allowed. There should be requirements to clean flues annually, and penalties should apply to any wood merchants selling green wood.	Amend the Plan Change to allow both NES or ULEB burners, with a strong recommendation to consider the ULEB. Require woodburner owners to clean burner flues annually (at least). Some requirement should be included about the purchase of wood - that wood sales are dry wood only and some penalties may apply to any wood merchants selling green wood.
62	Judith Honeybone	62.1	We wish to install a woodburner.	Not specified.
63	Charmian Koed	63.1	Concern that ULEBs are permitted activities. Council should follow a similar system to Christchurch, where approval is granted through the resource consent process. The Canterbury Air Quality Plan sets out what ULEBs must achieve, and this is missing from Nelson's Plan Change. Also missing is information about how ULEBs will be tested. Emissions could be higher than modelled for the Plan Change. A definition for 'real-life' is needed.	Specify how ULEBs will be tested and what they must achieve. Provide a definition of 'real life'.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
63	Charmian Koed	63.2	The Council is giving itself <i>carte blanche</i> to make decisions under Appendix 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. This is wrong, against the expressed aims of the Council and probably against the law.	Amend the Plan Change by deleting all aspects related to Airsheds A and B1.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
63	Charmian Koed	63.3	<p>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.</p> <p>The ULEBs in Airshed B2 and C are being permitted before the air quality improvements from the behaviour change programme is established, before it is known if the programme will work, and before it is shown by monitoring to have worked. ULEBs should only be allowed after the gains have been proved to have occurred.</p> <p>Allowing ULEBs before air quality improvements occur would worsen air quality and would be contrary to:</p> <ul style="list-style-type: none"> - the purpose of the Resource Management Act (which includes the life supporting capacity of air) - the Nelson Air Quality Plan objective of maintaining or enhancing air quality, which is not being changed - Policy A5-1.3 of the Nelson Air Quality Plan. 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 'Acceptable level or better'. <p>Behaviour change is both difficult and slow to achieve, and public education needs to be backed by rules and enforcement. Will the Council properly resource enforcement and follow up with action on breaches? We have no guarantee.</p> <p>The modelling for Airshed B2 and C seems to be based on very little monitoring data. There is also an absence of in home</p>	<p>Amend rule AQr.26A so that, for Airsheds B2 and C:</p> <ul style="list-style-type: none"> 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 to be installed.

			<p>testing of ULEB emissions.</p> <p>There seems to be a risk regarding existing air quality levels in B2 and C (because of low levels of monitoring), over the rate of 'natural attrition' of existing burners to 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 behaviour change programme. All of these things create doubt and a combined risk that new burners will be added to these airsheds, but that the modelled counterbalancing improvements won't eventuate - or at least not to the amount forecast.</p> <p>In addition, the rate at which people install ULEBs in Airsheds B2 and C may not be closely matched to the rate of modelled air quality improvement.</p> <p>Another point to consider is the likely change at an international and national level to focus on PM2.5. The Plan Change and section 32 report don't mention this. Compliance with this standard is likely to be harder to meet, so it doesn't seem prudent to install extra burners.</p> <p>There is already evidence that pollution in Airshed B2 contributes to higher levels in Airshed B1. Airshed B1 is only just meeting the standards, and could be pushed over the limit by flow on from Airshed B2.</p> <p>Because of all the uncertainties described above, the installation of ULEBs in Airsheds B2 and C should only be allowed to occur after the improvement in air quality has occurred, as demonstrated by good and reliable monitoring data.</p>	
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Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
64	Leigh Stevens	64.1	<p>There are obvious environmental and health benefits in enabling the installation of new ULEBs, as well as the ongoing replacement of existing fireplaces with LEBs and ULEBs.</p> <p>There are also very compelling social reasons for allowing home owners to heat their houses with woodburners, including civil defence emergency situations, local availability of cheap wood, and the aesthetic/cultural/psychological value of having a fire.</p> <p>Support Council using air quality improvements as one means of determining if additional woodburners can be consented. 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.</p> <p>Other causes of air quality degradation, such as vehicle emissions, also need to be considered when tackling air quality issues. The risk from woodburners is overstated and a more balanced approach is required.</p>	Retain Plan Change.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
64	Leigh Stevens	64.2	The current plan limits are overly restrictive in many instances. Council should be able to exercise discretion, particularly with regard to houses located in the upper reaches of the defined airsheds (above the inversion layer) and where the contribution to localised air quality degradation from ULEBs is likely to be negligible.	Amend Plan Change to allow for the discretionary consenting of more ULEBs, in addition to the limited number of additional woodburners proposed in the Plan Change.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
65	Eurocell Wood Products Ltd	65.1	<p>The rule makes installation of ULEBs a permitted activity subject to a number of conditions, including compliance with the requirements of Appendix AQ2B.</p> <p>It appears than in Airsheds A and B1 ULEBs will be able to be installed <i>"based on an examination of the relationship between winter-time PM10 concentrations and meterological conditions in Nelson"</i>, including a step 5: <i>"To assess the ability of additional burner numbers by considering the extent of capacity available, having regard to:</i> - <i>the Council's inventory of certified burners installed (and therefore the number that may still be certified/installed under the current allocation);</i> - <i>the impact of meteorological conditions on concentrations (including Airshed dispersion); and</i> - <i>real life emission factors and fuel use for new small-scale ultra-low emission burning appliance installations"</i>.</p> <p>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.</p> <p>It is well established that a Council may not reserve to itself a discretion to finally decide whether any activity is a <i>Permitted Activity</i> (or not) - the question is whether the 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</p>	Withdraw the Plan Change.

			<p>at best "<i>fluid</i>" and therefore the rule is ultra vires.</p> <p>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 "<i>spare capacity</i>" to ULEBs as distinct (or better put, in preference to) industry already existing in the Zone - thereby constraining the resource.</p> <p>Under the Plan Change Council can allocate capacity to residential users but industry that might want to use some of that "<i>available capacity</i>" achieved are shut out.</p> <p>Even if capacity was available, industry must go through a public consultation process, but ULEBs get allocated through an "<i>internal process</i>" which is neither public, transparent or open to challenge, thereby giving preference to residential activity over industrial.</p> <p>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.</p> <p>It seems the Council has adopted what could be termed a "<i>short cut</i>" 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.</p> <p>The Section 32 Analysis is inadequate and the requirements of the Act in that regard are not met.</p>	
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Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
66	Southpine Limited	66.1	<p>The rule makes installation of ULEBs a permitted activity subject to a number of conditions, including compliance with the requirements of Appendix AQ2B.</p> <p>It appears than in Airsheds A and B1 ULEBs will be able to be installed <i>"based on an examination of the relationship between winter-time PM10 concentrations and meteorological conditions in Nelson"</i>, including a step 5: <i>"To assess the ability of additional burner numbers by considering the extent of capacity available, having regard to:</i> - <i>the Council's inventory of certified burners installed (and therefore the number that may still be certified/installed under the current allocation);</i> - <i>the impact of meteorological conditions on concentrations (including Airshed dispersion); and</i> - <i>real life emission factors and fuel use for new small-scale ultra-low emission burning appliance installations"</i>.</p> <p>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.</p> <p>It is well established that a Council may not reserve to itself a discretion to finally decide whether any activity is a <i>Permitted Activity</i> (or not) - the question is whether the 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 <i>"fluid"</i> and therefore the rule is ultra vires.</p>	Withdraw the Plan Change.

			<p>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 "<i>spare capacity</i>" to ULEBs as distinct (or better put, in preference to) industry already existing in the Zone - thereby constraining the resource.</p> <p>Under the Plan Change Council can allocate capacity to residential users but industry that might want to use some of that "<i>available capacity</i>" achieved are shut out.</p> <p>Even if capacity was available, industry must go through a public consultation process, but ULEBs get allocated through an "<i>internal process</i>" which is neither public, transparent or open to challenge, thereby giving preference to residential activity over industrial.</p> <p>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.</p> <p>It seems the Council has adopted what could be termed a "<i>short cut</i>" 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.</p> <p>The Section 32 Analysis is inadequate and the requirements of the Act in that regard are not met.</p>	
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Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
67	John (Brent) Higgins	67.1	<p>Hot flues on free-standing appliances come into close contact with combustible materials. In order to prevent heat impinging on combustible surfaces (causing a house fire) shielding arrangements which require cooling air are installed to protect the combustible surfaces.</p> <p>A standard shielding arrangement sources its cooling air from <u>inside</u> the room being heated. It takes the hottest air in the room immediately beneath the ceiling and vents this air outside the house.</p> <p>The amount of cooling air required to keep the flue shields cool is significant. Losses are estimated at 7.5 litres per second. This means the hottest air in homes is being expelled simply to provide cooling to the flue shielding arrangements.</p> <p>Having personally inspected approximately 2000 freestanding appliances in Nelson, I estimate that 85 percent of the flue systems are 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, eg when the room is being heated by heat pump or electric heater on days when the fire has not been lit.</p> <p>Solution The solution is simple. Flue shield 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</p>	<p>Amend the Plan Change by changing Appendix AQ3 (Stack Requirements) by adding (after d): <i>"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."</i></p> <p>Alternatively (if it is not possible to make this change within the scope of this Plan Change), then the fall back option requested is to amend AQR.26A.1.ii a) by inserting AQR.26A.1.ii a) (iii) <i>"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."</i></p>

			<p>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/Heat saving kits is not significantly more expensive than a standard flue kit.</p> <p>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 and associated discharge of particulates.</p> <p>Changing Appendix AQ3 is preferred over changing rule AQR.26A to ensure this important change applies to all free-ranging fires being installed in future, eg where NES compliant fires are able to be installed as an upgrade in Airshed C. Whereas if the change is made to rule AQR.26A the new requirement will only apply to ULEB appliances.</p>	<p><i>(Then renumber the current AQR.26A.1 (ii) (a) (iii) and (iv) to be (iv) and (v).</i></p>
68	Deborah Baxter	68.1	<p>Replacement of a woodburner to comply with the Air Quality Plan rules cost \$5000. There is an issue of equity if people are allowed to get away with something that should have been done years ago. Equally, people buy or rent a house knowing they can't have a fire. The Air Plan should not be allowed to be reduced.</p> <p>However, the cost of heat pumps is an issue, and new owners could possibly be allowed to do that.</p>	Do not change the Air Quality Plan.
69	Pam and Rob Colee	69.1	<p>Too many people have older log burners and missed out on the Warm Homes Scheme or were unaware of it. Warmth is required for health reasons. Avoid reliance on electricity in case of power outages.</p>	Retain the Plan Change and allow all homeowners in Stoke to install a woodburner.

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70	Ross Haverfield	70.1	<p>Support for more use of woodburners. They use renewable fuel and heat homes more thoroughly than other forms of heating, eg heat pumps.</p> <p>Council should encourage central government to fund research and development of more efficient woodburners on a larger scale than individuals and producers are able to. Central government and councils should promote the use of cost-efficient, high heat energy producing devices, and actively encourage industrial scientists and researchers to invent cleaner burning units.</p>	Retain Plan Change.
71	Ruth Thomas	71.1	<p>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, heat pumps 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. Whereas our neighbours have the ability to install fires.</p> <p>In Airshed C the smoke from all the neighbouring fires seems to dissipate in the breeze so adding additional fires in this neighbourhood (especially ultra low emission burners) would not cause environmental problems and would significantly increase the enjoyment of our home over winter.</p>	Retain Plan Change.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
72	Dave Loose	72.1	Provide for the installation and reasonable use of woodburners that are environmentally friendly, with careful monitoring, in appropriately 'ventilated' airsheds.	Retain Plan Change.
73	Braydon Blance	73.1	For reasons of health and a source of heating that doesn't require power or gas in case of power outage.	Retain Plan Change.
73	Braydon Blance	73.2	<p>The change should not be limited to a certain number of households. Every household should have the option, not just those who get a permit in a first in first served scenario.</p> <p>When we originally bought our property we felt that the amount of time we had to replace our current burner, and find the money for it, was too short. We would like to be able to use our current burner while we await news on when and how we go about replacing it with an approved burner.</p>	Amend the Plan Change to remove limits on the number of households permitted to install a burner.
74	Albert Field	74.1	You can't get warm sitting around a heat pump. Heat pumps are no good in winter power outages. Everyone should have a woodburner.	Retain Plan Change.
75	David Cogger	75.1	Air quality issues could be mitigated with better enforcement/compliance checks. Less than 5% of woodburners put out 75% of the visible smoke emissions. 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. Illegal or non-compliant burners could be a major issue, and if the rules remain so strict then illegal installations are likely to increase.	Amend the Plan Change to allow clean air approved wood burners in all airsheds.

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76	Leanne Cross	76.1	Consider rezoning some of the areas as the current airsheds do not represent the geographic area well.	Amend the Plan Change to allow ULEBs in all airsheds, or change air shed boundaries to better reflect geographic areas.
77	Jeanette Aspin	77.1	Low emission burning appliances are a very efficient way to heat a home.	Amend the Plan Change to allow homeowners the choice to install a low emission burning appliance.
78	Sue Alsop, Nelson Asthma Society	78.1	Nelson Asthma Society would be concerned if air quality deteriorated and caused more hospital admissions.	Strictly monitor air quality to ensure air quality is not affected by this planned proposal.
79	Vicky Hawkey	79.1	A free standing or built-in woodburner with a wetback should be allowed to be installed.	Retain Plan Change.
80	Alistair Rollinson	80.1	Support adding ULEBs to the Nelson Air Quality Plan. However, NES woodburners should also be provided for in this Plan change in areas that are categorised as 'acceptable' such as Airshed B2. ULEB are still very limited, they generally heat only small homes (ie under 150m ²), and they need constant refuelling which makes them very impractical versus the cost of them. NES woodburners will heat homes up to 280m ² and require less frequent refuelling. Some NES woodburners, when loaded correctly, can also burn through the night.	Amend the Plan Change to allow NES burners in areas categorised as having "acceptable or higher" air quality.
81	Emma McCashin	81.1	There is a need for low cost heating options.	Retain Plan Change.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
81	Emma McCashin	81.2	The lower cost models (NES compliant woodburners) are a 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.	Amend the Plan Change to allow NES compliant woodburners to be installed.
82	Jill Harris	82.1	With continuing advancements in low emission technology it makes sense to be more flexible. Allowing woodburners gives people access to warmth which can be free or low cost. Woodburners also have a positive effect on wellbeing, 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.	Retain Plan Change.
83	Franciscus Rooth	83.1	I have no form of heating, only an open fire which is not in use. I would like to be able to use a clean air burner.	Retain Plan Change to allow use of clean air burners.
84	Sam Gavin	84.1	I have raised a child in two cold, drafty Nelson houses which were built around the turn of the century. In both cases it has been very cold in winter despite installation of a heat pump and insulation where feasible. This has badly affected my child's health. I would like clarity about how the 1600 ULEB (or 350 NES burners) will be allocated. I suggest that older, colder houses with higher studs and sash windows be given preference or be allowed bigger NES burners. I would prefer to install a NES burner for reasons of cost and capacity. Only the NES burners come with a wetback and the max 15KW capacity of ULEBs is insufficient for the size of our house (180m ²). Only a NES burner (max of around 24kW) will put out enough heat for this type of older house.	Amend the Plan Change to allow NES burners to be installed, with priority for allocation to older houses.

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85	Inga Schmidt	85.1	<p>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 to be what is being burned (wood that is not entirely dry, treated wood, coloured paper, rubbish etc). Having warm and dry houses is obviously important but so is fresh, non-toxic air.</p> <ol style="list-style-type: none"> 1. Could what gets burned be controlled? 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. Would the Council send out a person at the time when fires are lit and find out which household produces the smelling smoke and stop that? <p>The main concern is what gets burned. Council has encouraged and educated people on what to burn, These are useful steps; however this has not made a difference for us.</p> <p>Having more woodburners might only compound this air quality issue. These questions should be answered before more woodburners are allowed.</p> <p>Good quality dehumidifiers can be very beneficial in damp houses to avoid mould and may help in reducing heating costs.</p>	<p>Do not allow more woodburners until there is more control over what is burnt, steps are in place to reverse the situation if air quality gets worse, and active steps are taken in response to poor quality discharges from specific burners.</p>

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86	Linda Cunningham	86.1	Strong preference for the heat provided by woodburners (over heat pumps).	Retain Plan Change.
87	Peter Burton and Ed Kiddle, NMDHB Public Health Service	87.1	The NMDHB-PHS supports the proposed approach of allowing a specified number of ULEBs in certain areas, and not allowing ULEBs in Airsheds A and B1 given their poorer winter air quality.	Retain rule AQr.26A, permitting a specific number of ULEBs in Airsheds B2 and C, and not permitting ULEBs in Airsheds A and B1.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
87	Peter Burton and Ed Kiddle, NMDHB Public Health Service	87.2	The NMDHB-PHS considers 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 it continues.	<ol style="list-style-type: none"> 1. Set out how the behaviour change and monitoring programme itself will be routinely monitored, evaluated and reviewed to ensure that a 10% reduction in PM10 is achieved as a minimum. 2. Set out in the behaviour change and monitoring programme 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. 3. Incorporate PM2.5 monitoring in the behaviour change and monitoring programme to better inform the evaluation of the programme parallel to new rule AQR.26A.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
87	Peter Burton and Ed Kiddle, NMDHB Public Health Service	87.3	<p>The NMDHB-PHS supports in part the Plan Change's future provision for additional Ultra Low Emission Burners. NCC should be cautious in considering the "capacity" of an airshed to accommodate increased numbers of ULEBs. 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.</p> <p>The National Environmental Standard (NES) for PM10 should not be seen as a level to pollute up to. This approach would not be consistent with:</p> <ul style="list-style-type: none"> - policies in the Nelson Air Quality Plan which aim to improve ambient air quality - World Health Organisation findings that there is no safe level of exposure to PM10 and PM2.5 to which no adverse health effects occur - Environet Ltd's report to NCC which 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". <p>For these reasons, 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.</p>	Amend Appendix AQ2B.3.4 by changing the criteria for determining future capacity for additional ULEBs. Change the criteria to ensure an environmental outcome whereby there will be no degradation in air quality and a continuation of projected downward trends can be achieved.

			<p>Instead, the proposed criteria for determining whether additional ULEBs can be accommodated needs to ensure an environmental outcome - that there will be no degradation in air quality and a continuation of projected downward trends in PM10 can be achieved. 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.</p>	
87	Peter Burton and Ed Kiddle, NMDHB Public Health Service	87.4	<p>Airsheds A and B1, which have poorer winter air quality, also contain some of Nelson's most socially deprived areas. In addition, a greater proportion of the cities' cold homes are located within these areas.</p> <p>Note: the NMDHB is currently developing a position statement on the inter-related issues of warm homes and air quality and looks forward to presenting it to NCC and other local authorities in due course.</p> <p>It is 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).</p> <p>Cold homes also have health effects, and 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 homes and therefore other initiatives, such as improving thermal efficiency of homes, are important.</p> <p>For these reasons, it is very important that NCC continues to support initiatives to address cold homes and associated health effects alongside improving air pollution.</p>	<p>Continue to support the Warmer Healthier Homes programme and/or other initiatives aimed at improving thermal efficiency and home heating.</p>

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88	Rene Haeberli, EnviroSolve Ltd	88.1	<p>The Ultra Low Emission Burner appliances permitted to be installed has to be limited to burners with a fully automatically operated down draft (no manuals) or other fully automatic ultra low emission burning appliances.</p> <p>How can NCC guarantee that the specific application will operate within the predicted emissions and efficiency rates when the down draft has to be put in manually? It is totally 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 the phone, cooking etc, or simply cannot be bothered anymore to do it correctly because they now have a fire, and nobody can police it. The goal of reducing emissions cannot be achieved due to the errors or carelessness of the operators. Therefore, only fully automatic down drafts are the future, because we can eliminate these errors.</p> <p>The ULEB must be capable of operating the down draft fully automatically without a manual interaction by human beings. Manual down drafts do not pay attention to the fact of human error so the emissions will be dramatically increased, especially in the start-up phase or in the end phase (putting the down draft to right time and temperature in and out).</p> <p>ECan authorised three manual down draft burners despite the fact that the regulations were in place regarding tampering of the fire. (See attachments to the submission - Schedule 8 of the Proposed Canterbury Air Regional Plan.)</p>	State that the ULEB must be capable of operating the down draft fully automatically without any manual interaction by human beings.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
89	Harold Pearson	89.1	<p>Affordable NES compliant woodburners should be allowed to be installed in Airsheds B1, B2 and C, as the woodburner PM10 emissions from these airsheds do not breach NES regulations. There is a lot more capacity in these airsheds for NES compliant woodburners than Council staff and consultants have suggested.</p> <p>Allowing NES compliant woodburners in these airsheds is essential to ensure that people have an affordable choice in how they heat their homes, and for continual improvement in people's health, comfort and wellbeing. Warmer homes will also have a massive effect on respiratory illnesses, the prevalence of which is increasing in Nelson despite a national average decrease.</p>	Amend the Plan Change to allow the installation of NES compliant woodburners, to replace both compliant and non-compliant wood burners that are currently installed, in all airsheds except Airshed A. (This will enable older wood burners to be affordably replaced and this will reduce PM10 emissions.)
89	Harold Pearson	89.2	It is not practical or efficient to fully insulate homes that were built before the 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 wellbeing.	Amend the Plan Change to remove the limit on the number of approved woodburners that can be installed in homes built prior to when the Government's home insulation requirements came into force.
89	Harold Pearson	89.3	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 (eg 6pm to 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.	Employ at least one NCC staff member between 6pm 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.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
89	Harold Pearson	89.4	When assessing the 'capacity' for additional woodburners, ambient PM10 levels have not been fully taken into account. Capacity must be based on actual woodburner emissions relative to the number of woodburners, which has not been the case so far.	All PM10 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.
90	Anthony Radley	90.1	<p>Older homes require substantial energy input during winter to be comfortable and healthy to live in. Upgrading such houses to modern levels of air tightness and insulation is only partly practicable and is expensive. Heating by electricity has proven to be expensive and has not kept the home at a comfortable temperature. Pellet burners are noisy, expensive, have limited output and depend on electricity and special fuel.</p> <p>Allowing homeowners more choice would hopefully allow installation of burners with a suitably high output, thereby allowing people to live in a comfortable, healthy home at reasonable cost.</p> <p>There is not a domestic woodburner air quality problem affecting my area. 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 discomfort which arises from insufficient heating. At the same time I must witness many households nearby enjoying the comfort of a logburner. This means I am effectively subsidising their air quality while being penalised in comfort. Allowing more households to install woodburners would provide a means to address this disparity.</p>	Retain Plan Change.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
91	Keta Everett	91.1	I have a large home with no heating. I would need at least two large heat pumps which I cannot afford to buy or run in an old house. It gets freezing in winter and it's not good for me or the children. A woodburner would be more cost effective and heat the home sufficiently.	Allow all people in Atawhai to be able to have the heating of their choice and sufficient heating (ie. a new woodburner installed with Council consent).
92	Ministry of Education	92.1	The Ministry of Education supports the proposal to allow a fixed number of ULEBs to be installed in Airsheds B2 and C. However, the Proposed Plan Change states 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 may deteriorate as a result.	Amend AQr.26A.1 in order to delay introduction of ULEBs into the airsheds until 2018, when another two years of ambient monitoring data will be available. Requested wording: <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>

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
92	Ministry of Education	92.2	<p>The Ministry of Education supports in principle the certification process for determining the number of ULEBs that can be permitted in the Nelson airsheds. However, the Ministry 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, and that this will 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>Requested wording (of the first paragraph): <i>The Plan proposes to permit 1600 small scale ultra-low emission burning appliances in Airsheds B2 and C (collectively). This The allocation of appliances is <u>will be</u> 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> <p>Requested wording of b): <i>Through a certification process associated with updated monitoring and modelling after 2015 2017. 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</u> accommodated ...</i></p> <p><i><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></i></p> <ul style="list-style-type: none"> <i>- the number of ULEBs permitted</i> <i>- the Behaviour Change Programme</i> <i>- The replacement programme for older non-compliant burners.</i>

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
92	Ministry of Education	92.3	The Ministry 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. The number of ULEBs permitted should be determined after another two years of ambient monitoring data has been collected.	<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>Requested wording: <i>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 operative).</i></p> <p><i>a) In Airshed B2, no more than 1000 appliances shall be certified; or</i></p> <p><i>b) In Airshed C, no more than 600 appliances shall be certified.</i></p> <p><u><i>and the limits determined using the methodology prescribed in AQ2B.3.4 (from 1 January 2018).</i></u></p>

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
93	Melissa Short	93.1	<p>People should have the option of NES or ULE burners.</p> <p>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.</p> <p>Nelson is the only council in NZ to ban wood burners. All other councils deem keeping warm is as important as cleaning the air.</p> <p>Airsheds which have recently met national standards should also be allowed burners.</p> <p>Nelson City Council should implement a plan change that works to meet national standards. The Council should desist continuing to overreach the set limit by continuing to decrease PM10 well below what our Government requires - which is 300% stricter than what the World Health Organisation recommends.</p>	<p>Delete Plan Change and replace it with provisions stating that:</p> <ul style="list-style-type: none"> - in areas where there has been no history of pollution exceeding the NES, then approved NES burners are allowed (numbers uncapped) - in areas where pollution levels have recently met national standards, a mixture of NES and ULE technology is allowed.
93	Melissa Short	93.2	<p>Concern that what has been proposed does nothing to address the idiosyncrasies in the Air 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 in the burner market.</p>	<p>Amend the Plan Change to allow a mixture of ULE and NES burners and do not cap numbers.</p>

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94	Peter Olorenshaw and others, Nelson Woodburner Group	94.1	<p>The Plan Change doesn't appear to set any conditions on installation of ULEBs in new houses. However, new houses with their very good insulation levels, their level of air tightness and their double glazing, are the last ones that actually need log burners if we are going to restrict them.</p> <p>Log burners (NES compliant burners - not ULEBs) should be prioritised for 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 draft proofing are in fuel poverty, and very few people in new houses are getting sicker.</p> <p>Meeting the NES for Air Quality should be done by policing smoke rather than restricting burner numbers.</p> <p>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. The fact that their houses are new and up to current insulation standards means they should be much easier to heat.</p>	<p>Delete AQr.26A.1 (i) and replace with "NES compliant burners be allowed in any pre 1976 (or whenever the original insulation standards came in) houses in all airsheds Let that run for a year and see how much capacity there is before allowing new houses to put in burners. If there is headspace for more burners, then allow newer houses to install burners, but they must be ULEBs. We suggest this be done in decades - so initially pre-insulation standard houses have them, then (if there is still headspace) pre 1980 houses, and if there is still some headspace then 1990 houses and so on.</p>

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
94	Peter Olorenshaw and others, Nelson Woodburner Group	94.2	A major flaw with the Plan Change is that the portion of Airshed C which is north of 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 log burners.	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.
94	Peter Olorenshaw and others, Nelson Woodburner Group	94.3	<p>Airshed B1 actually has 62% higher pollution levels than Airshed A, when looked at on an annual basis. It is this total annual pollution that the Parliamentary Commissioner for the Environment is concerned about and says we should be moving towards regulating.</p> <p>The people who need log burners most (those in fuel poverty) and the most unlikely to be able to afford the extra \$3000 for a ULEB. The Council should not be instituting policies that exacerbate fuel poverty inequality. Those in fuel poverty often have a way of obtaining free firewood.</p>	<p>In Airshed B1:</p> <ul style="list-style-type: none"> - only allow pre-insulation standard houses to install log burners (NES compliant burners). - look at restricting industrial emissions in this air shed on an annual basis.

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95	J C Ironside	95.1	The wording of the rule should be made clear to ensure that clauses (a) and (b) apply to AQR.26A.1(i) as well as AQR.26A.1(ii).	<p>Requested change to AQR.26A.1: <i>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:</i></p> <p><i>(a) the appliance at all times:</i></p> <p><i>(i) complies with the requirements of Appendix AQ2B, and</i></p> <p><i>(ii) complies with the stack requirements in Appendix AQ3, and</i></p> <p><i>(iii) burns no fuels in Rule AQR.20 (Prohibited Activities), and</i></p> <p><i>(iv) is operated so that there is no discharge of excessive smoke (excluding a 15 minute start-up period), and</i></p> <p><i>(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).</i></p> <p><i>(Note: Compliance with Rule AQR.22 (General Conditions) is also required.)</i></p>

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96	Hubert Altenburg	96.1	It's nice and healthy to breathe fresh air! People who live in near new houses and are perfectly fine with using their heat pumps for heating 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 properly insulated and then a strong heat pump is perfectly sufficient. We don't need to go back to polluting our backyards for people with access to free or cheap wood which is often not seasoned properly. Who knows what people put in their burners in the middle of the night.	Delete Plan Change entirely.

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97	Tim Skinner	97.1	<p>Support the removal of the current prohibited status for new burners, as achieved in this proposed Plan Change. Oppose limiting this option to ULEBs. NES compliant burners are extremely clean burning and efficient, simple to operate and proven.</p> <p>In contrast, ULEBs (which may be similar or slightly better in efficiency) are a lot more expensive to buy and install. They are 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 are available and there are even fewer suppliers in Nelson.</p> <p>No one I have talked to has requested the ability to install a ULEB. Everyone wants the ability to install, or upgrade existing non-compliant fireplaces with NES approved burners.</p> <p>There is a need to correct the inequity of the current situation of one home able to use their burner, whilst their neighbour is not able to have a burner.</p> <p>There is a very unnecessary 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.</p> <p>The serious negative impact on Nelson's health occurred since the current restrictive rules. This is highlighted by a sudden and continual increase over the last 12 years of Nelson</p>	Amend the Plan Change to implement Option 3 of the December 2015 report to Council, and allow installation of NES approved woodburners as part of that option.

			<p>hospital admissions for respiratory illness due to cold damp homes since 2004. This trend bucks the current national trend. Currently Nelson's rules are by far the most restrictive in New Zealand.</p> <p>Three options were considered by Council in December 2015. I do not support Option 1 as outlined and proposed in the plan change report. I strongly prefer Option 3, with the amendment that NES burners be allowed rather than solely allowing ULEBs.</p> <p>The option of allowing NES burners is covered and modelled in the Plan Change report, and is also confirmed to fit within national standards. Option 3 (with NES compliant burners) is the best option for meeting national requirements, achieving Nelson City Council's goals, and also meeting the needs of Nelson residents. Option 3 would enable us to keep our homes and families warm and dry and well throughout the year, by the most effective form of heat generation, with the use of clean burning, carbon neutral wood burners.</p>	
98	McCashin's Brewery	98.1	<p>McCashin's Brewery supports the increase in choices available to residential and commercial premises for utilising a solid fuel burning appliance. However, an amendment is needed to the rule because as it currently stands it would exclude the McCashin's premises, because the 'Item' column of the rule only refers 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.</p>	<p>Amend AQR.26A as follows: <i>AQR.26A Item</i> <i>Existing buildings not using solid fuel within a small scale burning appliance</i></p>

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98	McCashin's Brewery	98.2	<p>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 the lower emission standards, which still enable Nelson to meet the NES requirements.</p> <p>However, the lack of distinction between the domestic household situation and commercial hospitality premises is an issue that requires addressing.</p> <p>While the Plan Change will allow commercial premises within the Stoke Airshed to install ultra-low emission burning appliances in 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 before the notification of the Air Quality Plan. In all other circumstances the matter becomes discretionary.</p> <p>Given the importance of this sector to the regional economy, these provisions are too restrictive and Council needs to address this as part of the wider review of the Air Quality Plan.</p> <p>Currently the provisions do not provide a level playing field. 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</p>	<p>The submitter accepts that Council cannot address this issue through its current Plan Change but seeks that Council direct staff to address the issue of the lack of distinction between the domestic household situation and commercial hospitality premises as part of the overall review process of the Air Quality Plan.</p>

			<p>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.</p> <p>The Council needs to provide a better balance of provisions for the hospitality sector, and this must certainly be addressed under the forthcoming full review of the Air Quality Plan.</p>	
99	Neville Male	99.1	<p>Ultra Low Emission Burners are not necessary when the more affordable NES burner will meet the standard of emission levels required.</p> <p>The issue about using woodburners is to protect human health. It is now clear that since the restrictions on the use of woodburners have been in place the number of hospital admissions for respiratory disorders has increased. This clearly indicates that the main cause of bad respiratory health is people living in poorly insulated, cold and damp homes.</p> <p>To continue to suggest emissions from woodburners are the major cause is now totally outdated and unsubstantiated by both monitoring data and health statistics.</p> <p>The monitoring of wood smoke emissions over the past three years has shown 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 burner.</p>	Delete the ULEB rule and replace it with a rule allowing NES compliant burners.

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100	Colin McBright	100.1	<p>Support allowing woodburners to be installed in some houses which don't currently have woodburners.</p> <p>I have my own supply of firewood but I am unable to use it as I am not permitted to install a new woodburner. This means it costs me a lot of money to heat my house and it is not environmentally friendly, as I am reliant on electricity and gas. I live in Todd Valley and it is unlikely that an extra woodburner or two will cause a significant increase in air pollution here due to the low density of housing.</p>	Allow installation of woodburners in Todd Valley.
101	Mary Wilson	101.1	<p>I moved to central Nelson in 2000. For six months of the year I could barely breathe, even <u>inside</u> my old villa. We could only go outside to breathe clear air at midday on some days. We can't return Nelson to even a fraction of that state, especially if Nelson is to implement inner city living to create year-long vibrancy.</p>	Amend the Plan Change to only allow replacement of 'legal' woodburners, and only allow this replacement to be with ultra low emission burners.
102	Kathleen Cohn	102.1		Retain Plan Change.

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103	Derek Shaw, Nelson Environment Centre	103.1	<p>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.</p> <p>The Nelson Regional Policy Statement has adopted the precautionary approach, with respect to resource management decisions. Given the complexity of air quality issues in Nelson, the difficulties and challenges of having adequate information and the potentially significant adverse effects on the environment, including community health, we believe this proposed plan change is a good example of where the precautionary approach should be applied.</p> <p>There are many aspects in the modelling studies and background reports related to the proposed Plan Change that contain assumptions, uncertainties and limited information that contribute to the need to be cautious with respect to this proposed Plan Change.</p>	<ol style="list-style-type: none"> 1. Do not make changes to the objective and policies of the Nelson Air Quality Plan through the proposed Plan Change A3 process. 2. Apply the precautionary approach to all aspects of the proposed Plan Change A3.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
103	Derek Shaw, Nelson Environment Centre	103.2	<p>Nelson Environment Centre supports provisions in proposed Plan Change A3 that only allow ULEBs to be installed in two airsheds, ie. no additional NES woodburners in any airsheds.</p> <p>Environment Canterbury (ECan) is proposing to phase out the current NES burners and only allowing them to be replaced by ULEBs. A similar approach should be considered in Nelson, especially if the household survey shows a high level of interest in being able to install ULEBs. Allowing only ULEBs to be installed as air quality improves would provide a larger number of people with the option to utilise wood for home heating than allowing a smaller number of higher polluting NES burners.</p> <p>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. Providing this occurs, we suggest that ULEBs be phased in over 5 years, ie 200 per year in Airshed B2 and 125 per year in Airshed C. Such a staged approach would enable the effectiveness of the associated Behaviour Change Programme and enforcement to be progressively evaluated and, if necessary, stepped up.</p>	<ol style="list-style-type: none"> 1. Give consideration to the phasing out of pre 2004 burners in order to help create capacity for ULEBs, especially if there is a clearly demonstrated demand for additional woodburners, and reductions in PM10 emissions through other means (natural attrition, replacement of old burners with ULEBs behaviour change and enforcement) are not able to provide the prerequisite capacity and buffer. 2. Require a public resource consent process for the staged introduction of 1000 and 600 ULEBs in Airsheds B2 and C respectively over five years, provided that ongoing monitoring clearly demonstrates the PM10 levels are consistently improving and below the NES standards (including an adequate buffer) and that there are no adverse impacts on the air quality in any other airsheds. 3. Amend the Plan Change to delete references to Airsheds A and B1. 4. Develop a priority system that allows the installation of ULEBs in houses in Airsheds B2 and C on a 'high needs' basis that includes criteria such as current level of

			<p>Support developing an approach which gives priority to allowing the installation of ULEBs in the homes of those with the highest needs, such as cold un-insulated or under-insulated houses, occupants with health issues such as respiratory diseases, low incomes, and heating currently undertaken with unflued gas heaters.</p> <p>Oppose ULEBs being able to be installed in new homes or those built since the current insulation and double-glazing standards became operative. New houses should not need any or, at worst, only very limited additional heating in winter. Allowing ULEBs in new houses may take away the incentive for good passive solar design and additional levels of insulation and double glazing.</p> <p>Given the uncertainties around the absence of in home testing of ULEBs, a more cautious approach should be taken to their installation in Airsheds B2 and C. A public resource consent process should be required, and they should only be allowed to be installed over time once it is clearly shown that air quality has improved as a result of behaviour change, natural attrition and/or any other methods, and when there has been an opportunity for 'real life' emissions from ULEBs to be evaluated.</p>	<p>insulation, occupants' health including presence of respiratory diseases, household income with preference for low income, and current heating methods including unflued gas.</p> <p>5. Give consideration to ways of assisting those for whom the financial cost of purchasing and installing a ULEB and improving home insulation is a barrier through facilitating loan schemes with banks or similar lending organisations and/or through a loan scheme tied to the rates on the property.</p> <p>6. Do not permit ULEBs to be installed in new houses or retrospectively in houses built since the current insulation and double-glazing standards in the NZ Building Code became operative.</p> <p>7. Undertake further work on the definition of ULEBs to determine how 'real life' emissions will be defined and measured. Give consideration to additional requirements such as those specified by ECAN (Environet Ltd, November 2015 report, p41) namely:</p> <ul style="list-style-type: none"> - A burner cannot be operated in such a way as to bypass the technology that results in ultra-low emissions. - The burner cannot be reasonably tampered with in such a way as to affect its performance. This generally means that it
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				<p>is unable to be tampered with using hand tools available in a home such as screwdrivers, spanners and files.</p> <ul style="list-style-type: none"> - If maintenance (such as cleaning and filter changing) is required for the technology to be effective in reducing emissions there must be a process in place that ensures this happens (such as condition of a resource consent). - The technology for reducing PM10 emissions must be designed to be effective for the duration of the burner's life.
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Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
103	Derek Shaw, Nelson Environment Centre	103.3	<p>It is difficult to judge whether it will be possible to achieve the target of a 10% reduction in domestic PM10 emissions through the proposed behaviour change programme. There is very little information in the section 32 report on the success of past and existing public education, behaviour change and enforcement on emission levels.</p> <p>The potential methods that may be utilised make good sense but given the Council has already undertaken a considerable number of these or something similar, much of the 'easy fruit' may have already been picked. For this reason, achieving an additional 10% may be a difficult and challenging target.</p> <p>The behaviour change programme was regarded as the most cost effective method to achieve reductions in PM10 emissions but it will very likely require an ongoing commitment of funding and staff time and an ongoing commitment to take enforcement actions against repeat offenders to be successful.</p> <p>There is potential for such commitments to wane over time with changes in political and staff leadership. A more cautious approach would suggest a lower target initially and further monitoring to check what reduction has been achieved, and adopting a more staged approach to allowing the installation of ULEBs once it is clearly demonstrated that the programme is achieving reductions in PM10 emissions. An initial target of 5% may be more achievable.</p>	<p>Set a lower target initially, such as 5%, for the reductions in PM10 emissions to be achieved through the behaviour change programme.</p> <p>2. Make a long term commitment to the behaviour change programme. If necessary, be prepared to step up the programme and enforcement action to ensure there is a clearly demonstrated improvement in air quality and reductions in PM10 to 'acceptable' levels before allowing the installation of ULEBs in Airsheds B2 and C.</p>

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
103	Derek Shaw, Nelson Environment Centre	103.4	<p>Council should also consider various other non regulatory approaches, in addition to the eco building design advisor and the behaviour change programme. This could include subsidising the cost of ULEBs, and retrofitting insulation and double glazing in old homes.</p> <p>We acknowledge that Council is contributing financially to the Warmer Healthier Homes Nelson Tasman project to improve the insulation of homes of residents with high needs in terms of health issues, low incomes and lack of insulation. We support this targeting of the needy and would like to see consideration given to increasing this contribution to enable more people to benefit from warmer and healthier homes.</p>	<ol style="list-style-type: none"> 1. Continue the eco building design advisor position for at least another 10 years. 2. Give consideration to Council providing assistance for home owners and landlords to obtain finance through banks or other financial institutions and/or a similar scheme to the former Clean Heat Warm Homes Programme to help cover the costs of purchasing and installing ULEBs and associated insulation and/or double glazing. 3. Continue Council's financial contribution, and consider increasing this contribution, to the Warmer Healthier Homes Nelson Tasman project.
104	Brendan Santorini	104.1	I suffer from arthritic pain in my right leg, which is more intense in winter. I want to heat my whole home and heat hot water. I have access to wood, whereas heat pumps are expensive and not very warm. As I have a disability my income is low and I live in the perfect situation for using a woodburner.	Amend the Plan Change to allow woodburners to be installed.

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
105	Debbie Beard	105.1	I am not warm enough in winter and need a fire to fully heat my home.	Retain Plan Change.
106	Glenn Mackay	106.1	Woodburners are the cheapest source of heating. There are good resources of wood in Nelson. It would create employment for supplying wood and burners, maintenance of burners, chimney sweeping etc.	<p>1. Amend the plan change to give people the choice of installing NES burners or ULEBs.</p> <p>2. Amend the plan change to make burner ownership transferable from one property to another.</p>
107	Nita Knight	107.1	Allow NES burners in areas that have capacity. Put in place an education programme on how to use woodburners effectively and the effect of burning of wet wood on air quality, together with active policing of this. The education programme should include schools to provide air quality education from an early age.	<p>Amend the Plan Change to allow NES burners in areas that have capacity.</p> <p>Put in place an education programme on how to use woodburners effectively and the effect of burning of wet wood on air quality, together with active policing of this. The education programme should include schools to provide air quality education from an early age.</p>

Submitter number	Submitter name	Submission statement number	Summary of submission details	Summary of decision requested
108	Darryl and Sandra Ware	108.1	<p>As we live in Moana Avenue (Airshed B1) and are in our seventies, we are really "too old" to wait for 'further improvements in air quality over the next few years' (as the Council expresses it). Our need is now. We have a heat pump but it is 15 years old and it is not enough, though it is still operating as it was designed to, and has been recently checked and pronounced healthy. However we feel winter more keenly now. Yet Airshed B1 is required to wait.</p> <p>We'd all far prefer to use properly stored dry wood (than heat pumps or pellet burners).</p>	Not specified.

Address for Service of Submitters

Plan Change A3 (Wood Burners)

Submitter number	Submitter name	Address
1	Bill Brett	34 Brook Street Nelson
2	Thorkild Hansen	25 Poynters Crescent Stepneyville Nelson 2010
3	Katharine Day	57 Shelbourne St Nelson 7010
4	Cole Ryan	16 Iwa Road Nelson
5	Brandon Freiberg	1 Clairmont Heights Stoke Nelson
6	Alan Thornborough	346 Nayland Road Stoke Nelson
7	Jane Murray	9A Atmore Terrace Nelson
8	Samantha Hart and Nathan Carmody	277 Annesbrook Drive Annesbrook Nelson
9	Jean Edwards	23 Rangiora Terrace Tahunanui Hills Tahunanui Nelson
10	Graham and Jennifer St John	298 Seaview Road Nelson
11	Simon Hall	122 Nile Street Nelson
12	Joanna Cranness	72a Chamberlain Street Nelson
13	Tony Healey	PO Box 1014 Nelson 7040
14	David McNicoll	389 Suffolk Road Stoke Nelson
15	Juliet Westbury	169 Quebec Road Nelson 7010
16	Paula Nairn	81 Emano Street Nelson
17	Kelly Short	1/65 Weka Street Nelson
18	Rebecca McCulloch	115 Emano Street Nelson
19	Joe Berkow	14 Allan Street Nelson
20	Shane L Haydon	8 Freyberg Ave Stoke Nelson 7011

Submitter number	Submitter name	Address
21	Felicity Watson	164 Nayland Road Nelson
22	Peter Taylor	PO Box 675 Dunedin 9054
23	Carlo Wiegand	30 Konini Street Nelson
24	Jennifer Witchlow	15 Harper Street Nelson
25	Penny Adlington	12 Roto Street Nelson
26	Andrew Murray - t/a McCashin's Brewery	660 Main Road Stoke Nelson 7011
27	Carol Glen	23 Airlie Street RD 1 Nelson
28	Tom Kennedy	170 Nile Street Nelson
29	Mary Sullivan	21 Coster Street Enner Glynn Nelson
30	Chris Myers	96 Tukuka Street Nelson South Nelson 7010
31	Anne Allen	15 Montebello Ave Stoke Nelson
32	Thomas Koed	37 Brook Street Nelson
33	David James	213 Collingwood Street Nelson
34	Clare Monti	210 Brook Street Nelson 7010
35	Dan McGuire	45 Domett Street Nelson
36	Bev Webster	7 Chamberlain Street Tahunanui Hills Nelson
37	Claire Newcombe	84 Cambria Street The Wood Nelson
38	Bryan Banks	7 Ledbury Road Atawhai Nelson
39	Hazel Thelin	9 Ngatiawa Street Nelson South Nelson 7010
40	Albert Hutterd	PO Box 5090 Nelson
41	Helen Parry	338 Pomona Road RD1 Upper Moutere 7173
42	Floor van Lierop	261a Vanguard St Nelson

Submitter number	Submitter name	Address
43	Elizabeth Preest	19 Ngaio Street Stoke Nelson
44	Tony Karsten	25a Brougham St Nelson
45	Tom and Margaret Higgins	15 Harold Place Stoke Nelson
46	Anne Catherine Jones	Flat 1, 47A Washington Road Washington Valley, Nelson 7010
47	Lesley Brown	11 Werneth Street Atawhai Nelson
48	Adam Lloyd	6 Kamahi Way Nelson
49	Adrian Secker	13 Brougham Street Nelson 7010
50	Rob and Mary Stevenson	4B Allan St Nelson
51	Godfrey Watson	47 Tui Glen Road Atawhai Nelson
52	Turhan Djemal	474 Atawhai Drive Nelson
53	Gregory West	House 2 - 155 Vanguard Street Nelson
54	David and Robin Hall	11a Tainui Street Stoke Nelson
55	Margot Souness	89 Brook Street Nelson 7010
56	Lily Lo	12 Taunton Place Nelson
57	Kate Russell	7 Rimu Street Nelson
58	Peter Wood	51 Pohara Valley Road RD1 Takaka 7183
59	Emily Bolton	165 Quarantine Road Annesbrook Stoke Nelson
60	Paul Young	10 Waimea Road Nelson South
61	Annabel Norman	25 Stanley Crescent Nelson
62	Judith Honeybone	14 Ferniehurst Street Somerfield Christchurch 8024.
63	Charmian Koed	5 Maire Street Nelson 7011

Submitter number	Submitter name	Address
64	Leigh Stevens	21 Mt Vernon Place Washington Valley Nelson
65	Eurocell Wood Products Ltd	Justine McDonald C/- McFadden McMeeken Phillips PO Box 696 Nelson
66	Southpine Limited	Tony Wilkinson C/- McFadden McMeeken Phillips PO Box 696 Nelson
67	John (Brent) Higgins	9 Atawhai Drive Nelson 7010
68	Deborah Baxter	1-177 Quebec Road Nelson
69	Pam and Rob Colee	13 B Surrey Road Richmond
70	Ross Haverfield	8 Britannia Heights Stepneyville Nelson 7010
71	Ruth Thomas	14 C Montrose Drive Nelson
72	Dave Loose	782a Atawhai Drive Marybank Nelson 7010
73	Braydon Blance	24 Towai Street Stoke Nelson
74	Albert Field	93 Panorama Drive Enner Glynn Nelson
75	David Cogger	37 Mount Street Nelson
76	Leanne Cross	37 Mount Street Nelson
77	Jeanette Aspin	170 Main Road Spring Grove RD 1 Wakefield
78	Sue Alsop, Nelson Asthma Society	Richmond Town Hall 9 Cambridge Street Richmond 7020
79	Vicky Hawkey	1/12 Paremata Street Atawhai Nelson 7010
80	Alistair Rollinson	28 Woodstock Place Stoke Nelson
81	Emma McCashin	255A Nayland Road Stoke Nelson 7011
82	Jill Harris	36 C Victoria Heights Nelson

Submitter number	Submitter name	Address
83	Franciscus Rooth	18 Parere Street Nelson
84	Sam Gavin	18 Harley Street Nelson 7010
85	Inga Schmidt	19 Douglas Road Nelson
86	Linda Cunningham	27 Stafford Avenue Annesbrook Nelson
87	Peter Burton and Ed Kiddle, Nelson Marlborough District Health Board Public Health Service	C/- Angela Lenz Nelson Marlborough District Health Board Public Health Service 281 Queen Street Richmond 7020
88	Rene Haerberli, EnviroSolve Ltd	133 Ohakune Road RD 3 Wanganui
89	Harold Pearson	104a Songer Street Stoke Nelson 7011
90	Anthony Radley	106 Arapiki Road Nelson
91	Keta Everett	14 Dodson Valley Road Nelson
92	Ministry of Education	Ministry of Education C/- Jess Bould Beca Ltd PO Box 13960 Christchurch
93	Melissa Short	2/125b Tasman Street Nelson
94	Peter Olorenshaw and others, Nelson Woodburner Group	C/- 10 Ralphine Way Nelson
95	J C Ironside	6 Moore Road Wakefield 7095
96	Hubert Altenburg	52 Cleveland Terrace Nelson 7010
97	Tim Skinner	2 Brook Terrace Nelson
98	McCashin's Brewery	C/- Jackie McNae Staig & Smith Ltd PO Box 913 Nelson 7040
99	Neville Male	9 Rosebank Terrace Stoke Nelson
100	Colin McBright	41 Todd Bush Road Nelson
101	Mary Wilson	PO Box 5 Nelson 7040
102	Kathleen Cohn	999 Bay View Road Nelson

Submitter number	Submitter name	Address
103	Derek Shaw, Nelson Environment Centre	PO Box 602 Nelson
104	Brendan Santorini	19 Strathaven Place Atawhai Nelson
105	Debbie Beard	13 Hamill Grove Stoke Nelson
106	Glenn Mackay	12 King Street Nelson 7010
107	Nita Knight	PO Box 664 Nelson 7040
108	Darryl and Sandra Ware	115 Moana Avenue Nelson 7011