

038

BOPRC ID: A2802144

Submission Form

Number Office use only

Send your submission to reach us by 4.00 pm on Wednesday, 18 April 2018

Post: The Chief Executive

Bay of Plenty Regional Council PO Box 364 Whakatāne 3158

or Fax: 0800 884 882 or email: air@boprc.govt.nz

Submitter Name:

Richard Mallinson

This is a submission on Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

I could not gain an advantage in trade competition through this submission. [Delete as required.]

2 The details of my submission are in the attached table.

3 I wish/do not wish to be heard in support of my submission. Maybe depends when it is

4 If others make a similar submission, I will consider presenting a joint case with them at a hearing. [Delete if you would not consider presenting a joint case.]

_____ [Signature of person making submission or person authorised to sign on behalf of person making submission.] Date [NOTE: A signature is not required if you make your submission by electronic means.]

Address for Service of Submitter:

71a Blomfield Street Rotorua

Telephone Daytime: 0274516131 After Hours: 07 3501169

Email: rjk.mallinson@xtra.co.nz

SUBMISSION POINTS:

Page No Reference (e.g. Policy, Rule, Method or Objective number)

AQR12C

And AQR14A

Support/Oppose

Decision Sought- Say what changes to the plan you would like

Existing wood burners should continue to be a permitted activity after January 2020.

Give Reasons

- 1. Particle discharge is determined by how dry the wood is rather than the type of solid fuel burner older fires can produce very little particulate if they are used properly likewise new more efficient fires can produce more particulate if used improperly, so where's the gain for the extra expense of a replacement fire?**
- 2. No consideration has been given to the detrimental health effects where fires have been removed and properties are left with inadequate heating.**
- 3. Landlords who are unwilling to bear increased costs are likely to remove non-compliant fires and leave tenants with expensive to run oil heaters or non-vented gas heaters which are a known health hazard. This will hit the people the rule is trying to protect. Note the Hot Swap programme is not available to landlords so they are likely to go for the cheaper option rather than spend half the properties yearly income on a replacement compliant fire or heat pump. This will leave tenants in either unheated homes or facing large power bills. If they do go for the extra cost this will be passed on as higher rents to tenants who will often be in a position to ill afford it.**
- 4. Rotorua is a forestry area. People within Rotorua often have easy access to wood it is a cheap heating option when independently sourced. Denying access to wood as a heating source will financially disadvantage a large number of people.**
- 5. Figures from the section 32 evaluation supporting document quote up to 16 premature deaths in the 30+ age group in the Rotorua air catchment due to particulate produced by solid fuel fires over just eleven days per year. The 30+ population within the Rotorua air catchment is less than 25,000 people the current NZ death rate is 7.2 per thousand that's 180 people within this age group within the Rotorua air catchment; your supporting document is stating that almost 10% of these mortalities are caused by solid fuel fires! A figure that is hard to believe, for BOPRC to quote such high figures is emotive and alarmist, the use of quoted statistics such as in the section 32 report which is based on one dated piece of research is flawed; BOPRC continually using these figures without questioning their validity is misleading.**
- 6. According to the section 32 report 12% of particulate within the Rotorua air catchment is produced by transport, where is RLC and BOPRCs support for alternate electric vehicles? And how many electric vehicles do these organisations run within the air catchment? Let's see you walk the talk before you lay the law down.**

- 7. The monitoring station in Edmund Road is in the low point of a catchment reserve, how representative of the whole air catchment is this monitoring point? To say it represents the state of the whole air catchment is misleading.**
- 8. The section 32 supporting document quotes that “7650 solid fuel burners will need to be replaced” at a cost of \$4,500.00 each for the existing fire removal and the fitting of a compliant fire or heat pump that’s \$34,425,000.00 million dollars, so that’s \$34.5 million dollars out of the Rotorua economy. An extra expense on 7,650 households many of whom will not be a position to cover these costs.**
- 9. The Hot Swap scheme takes no account of properties that have had fires removed at point of sale, this leaves the new house owners in a position where the home is left with no heating, how healthy is that?**
- 10. Solid fuel fires are not affected by power cuts, Parts of Auckland have just gone six days without electricity. That could just as easily happen in Rotorua.**
- 11. The people most likely to be negatively affected by this rule change are the least likely to wade their way through the submission process they are likely to get lumped with a rule change that they were unaware of. Silence from these property owners does not indicate agreement with these proposed rules.**

