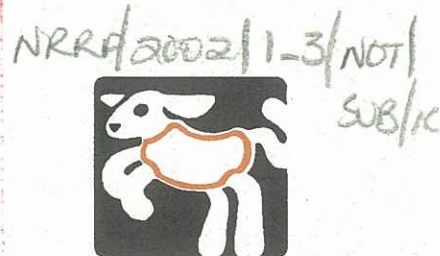


Woolover Limited

EC - CHCH	
FILE REF:	
DOCUMENT No:	
14 NOV 2007	ACTION
104154	INFO
J Glennie	



TO: JOHN GLENNIE

NATURAL RESOURCES POLICY MANAGER
ENVIROMENT CANTERBURY
58 KILMORE STREET
CHRISTCHURCH.

DATE; 13TH NOVEMBER 07

SUBJECT; APPLYING FOR EXCLUSION FROM RULE AQL 1 CONDITION
1 ## 03 -062 04 b 02.

SUBMITTER; 344 BEING WOOLOVER LIMITED.

Dear John,

Thanks for the opportunity to make submissions regarding the above Rule as printed. I am sending in with this submission, my original letter to you setting out how we arrive at this point. Nothing has changed from my original letter.

To the points raised in Rule AQL 1 ## 03- 062 04b02, and considered, your team state that my using the Jet-Master in conjunction with DRY WATTLE WOOD, that the Commissioners think it inappropriate to dispense with the rules for one particular burner using one particular type of fuel [in this case dry wattle wood], even if there is some factual justification for doing so.

This is the point, I use our fire with consideration when the temperature drops, and invite you to TFST the Jet-Master on site at our place.

It should also be noted our actual house location at 214 Rutland Street, borders 150 acre of farm land and was Classed as Rural 3 at the time of our purchasing the in 2001.

Other points; Dry wood is the key and that "driven by necessity" I believe further development will provide Log Burners and Open Fires with the technical improvements that will assist homeowners to stay warm and have a dry home inside.

Finally, I wish to have my Submission 344 Rejection Recommendation reheard or overturned, allowing me to continue using my Jet-Master Fireplace in a considerate manner using Dry Wattle wood.

Yours Sincerely,
David Brown,

214 Rutland Street
St Albans.
Phone; 03 3544123.

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Christchurch
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Phone/Fax 64 3 354 4123
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Submission 433

The submitter seeks an additional condition so that small scale gas burning devices are excluded from conditions 1 and 2 (emission stack and vertical efflux velocity criteria).

Rule AQL1 is permitting existing solid fuel burning appliances, not gas appliances. That should be clear from the definitions of the words used. No change is recommended as a result of this submission, as it is recommended that it is rejected.

Recommendation

Accept

Submission 98.

Reject

Submission 433.

Amendment Required

That ECan consider a variation to provide for new technologies.

Rule AQL1 Condition 1 ## 03-062 04b02

115	L. Wilkinson	Adopt the same rules for urban areas in the region. All smoke problems should be dealt in the same way. Need a clause stating that if the problem exists after these measures have been assessed/adopted then conduct further investigation to resolve on a case by case basis. Include the conditions to eliminate potential problems.
344	Woolover Limited	Decide on the measurements without jeopardising the use of a clean burning Jet-Master system in conjunction with dry wattle wood.
347	Federated Farmers Of New Zealand Inc, North Canterbury Branch	Delete conditions so that all emissions from domestic heating appliances including open fires outside of the Christchurch Clean Air Zone is a permitted activity.

Consideration

Submission 115

The substance of this submission has been considered above see Policy AQL13, ## 03-036-38-00 - 03-036-39-00, 115. See also Rule AQL1, Enclosed burners or open fires anywhere in Canterbury installed before 1 January 2004 - permitted activity ## 03-062 03 00, 28, 115. Those analyses are adopted. The recommendation is the same – that the submission be rejected.

Submission 344

The submitter seeks that clean burning wattle wood used in an existing 4 year old open/glass fronted burner be permitted past January 2008. The submitter is referring to a Jet-Master fire which does not comply with the 1g/kg and 65% thermal efficiency criteria.

Rule AQL1 permits the continued use existing solid fuel burning appliances, as long as the conditions are complied with.

Policy AQL11 and Rule AQL2 specify emission criteria of 1 gram of total suspended particulate per kilogram of fuel burned and 65% thermal efficiency. The NES sets design and thermal efficiency standards for a woodburner - a discharge of less than 1.5 gram of particles for each kilogram of dry wood burnt and 65% thermal efficiency. This is applied to the discharge of particles to air from a woodburner installed in a building on a property with an allotment size of less than 2 hectares. Rules in a regional plan cannot have any effect if they are less strict than the NES (section 43B of the RMA). The Commissioners have already made recommendations in relation to Policy AQL11 above and they consider Rule AQL2 below. Clearly it would be inappropriate to dispense with the rules for one particular burner using one particular type of fuel - even if there were some factual justification for doing so. It is recommended that the submission is rejected.

Submission 347

The submitter seeks that condition 1 is deleted so that all emissions from domestic heating appliances including open fires outside of the Christchurch Clean Air Zone is a permitted activity. This submission was considered above - ## 03-062-03-00. That analysis is adopted.

Rule AQL1 is permitting existing open fires and solid fuel burning appliances installed prior to 1 January 2004. The conditions seek to minimise potential localised adverse effects if the devices are not used properly. It is recommended that the submission be rejected.

Recommendation

Reject

Submissions 115, 344, 347.

Amendment Required

None required.

Rule AQL1 Condition 1(b) ## 03-062 04b07

33	GLG New Zealand Ltd	The requirement for condition (b) in AS/NZS 2918 is now 1000mm, not 900mm.
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Consideration

Submission 33

The submitter points out that the requirement for condition 1(b) in AS/NZS 2918 is now 1000mm, not 900mm.

The NZS 7421:1990 “Specification for installation of solid fuel burning appliances” has been jointly revised with the AS 2918-1990 standard “Domestic solid fuel burning appliances – Installation” to now become the joint Australian/New Zealand Standard – “AS/NZS 2918:2001 Domestic solid fuel burning appliances – Installation”. This standard contains the standard for the stack height of solid fuel burners.

Chapter 3 used the then applicable standard - NZS 7421:1990 - for the stack height conditions in Rules AQL1 to AQL4. This standard has now been revised and in AS/NZS 2918:2001, the minimum height of a flue system further than three metres from the highest point of a roof is set at 1000mm above roof penetration. It is recommended that the submission be accepted and that change is made to reflect the revised standard AS/NZS2918: 2001.

NOTES : ORIGINAL SUBMISSION.

Woolover Limited



TO: JOHN GLENNIE / LINDA KIRK
REGIONAL POLICY MANAGERS,
ENVIROMENT CANTERBURY.

Date; 16th August 05

Subject; DETAILS FOR MY SUBMISSION INTO RETAINING THE JET-MASTER
FIRE PLACE AND CONTINUEING TO USE IT.

I MADE A COMMERCIAL DECISION TO BRING TWO TRUCK AND TRAILER
UNITS OF WATTLE WOOD, TO CH-CH AFTER PURCHASING OUR HOUSE IN
CH-CH IN 2001. THIS HOUSE WAS BUILT IN 1998.

THE REASON I WISH TO RETAIN THE RIGHT TO CONTINUE TO USE THE JET
-MASTER IS;

WE BURN ONLY DRY WOOD [CUT AND STORED AND COVERED].
THE UNIT IS CORRECTLY MAINTAINED ie CHIMNEY SWEEP ANNUALLY
AND WITH A REVOLVING EMPORER COWLING INPLACE THE RESULTING
VACUUM ENSURES CLEAN BURNING WITH LITTLE OR NO VISIBLE SMOKE.

THE FIRE IS ONLY USED IN WINTER [SAY A MAXIMUM OF 45 TIMES WHICH
WILL INCLUDE THOSE SOUTHERLY AND OR EASTERLY THREE DAY
STORMS.

NO ATTEMPT IS MADE TO BANK THE FIRE UP SO THE MAXIMUM TIME
THAT THE FIRE IS GOING IS SAY 5 HOURS OF AN EVENING.
WE HAVE ELECTRIC UNDERFLOOR HEATING IN THE KITCHEN WHICH
COPEs WITH THE MORNING REQUIREMENTS.

AS REGARDS YOUR PUBLISTITY CAMPAIGN;
YOU CLAIM UP TO 70 DEATHS OCCUR ANNUALLY FROM RESPIRITARY
CONDITIONS. I GUESS THAT 95% OF THESE RESPIRITARY CONDITIONS ARE
THE RESULT OF THESE PEOPLE HAVING SMOKED.
SMOKING WAS A CHOICE THEY MADE
REMOVE THESE PEOPLE FROM YOUR FIGURES.

THE NUMBER OF STILL NIGHTS -30 TO 40 PER YEAR. IF THE CONDITIONS
ARE OF CONCERN THEN STAY HOME. I SUGGEST THAT IF THE NIGHT WAS
WET COLD AND WINDY THESE PEOPLE WOULD STAY HOME ANYWAY.
WHAT ABOUT THE THREE DAY SOUTHERY OR EASTERLY?
THERE WILL NOT BE A PROBLEM AND PEOPLE WILL WANT TO STAY
WARM.

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ABOUT 7 YEARS AGO THE CH-CH CITY COUNCIL MADE \$60-70 MILLION BY SELLING ITS SHARE IN ORION [I THINK IT WAS]. THIS WAS THE MONEY THAT SHOULD HAVE BEEN MADE AVILABLETO THE OWNERS OF OLDER HOUSES TO INSULATE THEIR HOUSES.

THIS WAS THE REAL MONEY TO GET THE JOB DONE.

TO THOSE HOUSES WITH LOG BURNERS I SUGGEST THAT LET THEM GO OUT AT BED TIME. DON'T BANK THEM UP AND HAVE THEM "SMOULDER" ALL NIGHT,

BUT SIMPLY USE FIRELIGHTERS AS THE QUICK METHOD OF FIRING THEM UP IN THE MORNING. NO KINDLING JUST LOGS AND FIRELIGHTERS.

IN SUMMARY; DRY WOOD, AND MY DESIRE TO EXTRACT THE MAXIMUM HEAT AND CLEAN BURNING FROM MY JET-MASTER ARE THINGS I CAN CONTROL.

I HAVE ENOUGH DRY WATTLE WOOD TO LAST ME 20 YEARS AND GIVEN THE COST OF GETTING THE WOOD TO THIS POINT I SEEK PERMISSION TO CONTINUE USING MY JET-MASTER IN A THOUGHTFUL AND CONSIDERATE WAY.

AS REGARDS EFFECINCY THEN FOR GODS SAKE DON'T SEND ME ANY MORE LITERATURE AND REPORTS ON YOUR CAMPAIGN. I FEAR THAT THE PAPER REQUIRED TO DATE WILL PUT PRESSURE ON THE ABILITY OF CANTERBURY PROVINCE TO SUPPLY.

THE LATEST CAMPAIGN IS AN INSULT TO US ALL AS YOU CLAIMING THAT LAST NIGHT 7 TONNE OF POLUTANTS WERE PUMPED INTO THE CH-CH AIR. 6 OF THE LAST 8 NIGHTS HAVE BEEN VERY WARM .

THE TOTAL MONEY POURED INTO THIS PROJECT I BELIEVE WOULD EXCEED 8 MILLION \$.

SOME IF NOT ALL OF THIS \$ SHOULD HAVE BEEN TARGETED AT DESIGNING A WOOD BURNER THAT COMPLY'S .

Yours Sincerely,
David Brown.