

TE WAIORA



Nelson Marlborough
Health

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**Further submission on Proposed
Private Plan Change 28 Maitahi
Bayview to the Nelson Resource
Management Plan**

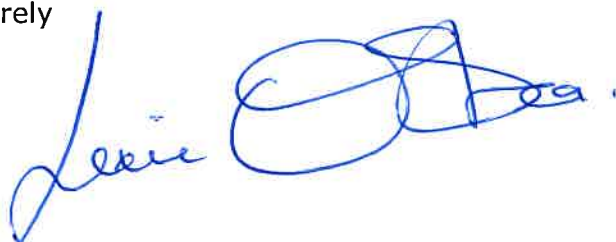
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Further submitter details

1. Nelson Marlborough Health (NMH) (Nelson Marlborough District Health Board) makes the further submissions on the Nelson City Council (NCC) Proposed Proposed Private Plan Change 28 Maitahi Bayview to the Nelson Resource Management Plan.
2. In accordance with clauses 8(1)(a) and (b) of the First Schedule of the Resource Management Act 1991, NMH represents a relevant aspect of the public interest and has an interest greater than the general public, in recognition of its:
 - functions and responsibilities in funding and providing health services to the public, (e.g. for disabilities, mental health), under the Health and Disabilities Services (Safety) Act 2001
 - public health responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956
3. NMH remains neutral regarding the Private Plan Change. However should this Plan Change go ahead, there is a number of matters of interest and concern to NMH.
4. NMH **would like to be heard** in support of its submission.
5. NMH is not prepared to consider presenting a joint case with others who have made a similar further submission.

Yours sincerely



Lexie O'Shea
Chief Executive
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Appendix I – Further submissions of Nelson Marlborough Health (NMDHB) on the Proposed Maitahi Bayview Development

Submission point	Name of Submitter / Submission No.	Relief sought by Submitter	Support/ Oppose	Reason	Allow/ Disallow
S183.001	Bill Gilbertson, 183	<p>Ch.7 Sch. Resid Zone – Sch. X:</p> <p>The plan change should include a comprehensive design of the cycle/shared path routes and how they will be compliant with Ausroad standards and the NZ Cycle Trail Design guide at a level suitable for most people.</p> <p>The plan change should also include a development levy specifically targeted to improvements to the cycle network links to the CBD.</p>	Support	<p>Active forms of transport, such as walking and cycling, have a range of environmental benefits, including producing no air pollution, noise pollution or greenhouse gases.</p> <p>Walking or cycling for transport helps integrate physical activity into everyday life. The health benefits of active transport include increased physical activity, improved mental health and reduced risk of diseases, such as cardiovascular diseases and cancer.</p> <p>NMH would like to see comprehensive designs of new paths and see funding allocated so that the new development is well integrated into the existing cycle network.</p>	Allow
S28.001	Marc Gutenstein 28	<p>Ch.7 Resi. Objectives & Policies. O RE3: Dedicated and uninterrupted pedestrian and cycle linkages should be an integral part of design and provided from the development area to Nelson Central School and town</p>	Support	<p>The benefits of walking and cycling are listed in our submission point above. NMH agrees that pedestrian and cycling linkages are integral in order to provide people with mode choice.</p> <p>NMH continues to advocate for reduced speed limits. Slower speeds will improve accessibility and amenity of these areas. Speed has adverse effects on levels of environmental and noise pollution, and the “liveability”</p>	Allow

S314.002	Ngati Rarua 314	<p>centre.</p> <p>Reduced speed limits and physical traffic control measures to limit vehicle speed between development area and town centre</p> <p>Ch.7 Resi. Objectives & Policies. O RE6: Reword (b) as follows: (b) Gives effect to Te Mana o te Wai; and involves Tangata Whenua throughout the subdivision and development process. <i>(c) involves Tangata Whenua throughout the subdivision and development process</i></p>	Support	<p>of urban areas¹. Lower vehicle speeds and volumes lead to reduced noise, vibration and emissions in the environment.</p> <p>NMH supports the proposed rewording as it makes it clear that tangata whenua involvement is not restricted to the specific issues of giving effect to Te Mana o te Wai.</p>	Allow
S314.004	Ngati Rarua 314	<p>Ch.7 Objectives & Policies. Policy REG.2: iv) Reword bullet point 2 to: "Consultation with Iwi on issues relating to the relationship of Māori with their ancestral lands, water, sites, waahi tapu and other taonga, and other matters relating to their cultural, social, economic</p>	Support	<p>NMHs supports the proposed amendment as it encompasses tangata whenua values and interests that incorporate the natural, cultural and built environment along with wellbeing.</p>	Allow

¹ <http://apps.who.int/iris/bitstream/10665/254760/1/WHO-NMH-NVI-17.7-eng.pdf?ua=1>

S314.006, 007 & 012	Ngati Rarua 314	<p>and physical wellbeing</p> <p>Ch.7 Sch. Residential Zone Sch X. X2 &X3:</p> <p>Add new matter of discretion:</p> <p>“xi) Any recommendations made in the Cultural Impact Assessment required in X.8 of this Schedule.”</p> <p>And</p> <p>Add new matter of discretion:</p> <p>“viii) Any recommendations made in the Cultural Impact Assessment required in X.8 of this Schedule.”</p>	Support	<p>NMH supports these recommendations for requirements for Cultural Impact Assessment to be added as a matter of restricted discretion as this better aligns with the intention of Objective RE6 and Policy RE6.2 in respect to the ongoing involvement of tangata whenua in the subdivision.</p>	Allow
S314.012	Ngati Rarua 314	<p>Ch.7 Sch. Residential Zone Sch X. X8</p> <p>Reword (c) to:</p> <p>“ ... or subdivision. The extent to which recommendations in the Cultural Impact Assessment have been included shall be detailed in the resource consent application.”</p>	Support	<p>NMH supports the proposed amendments that require resource consent applicants to demonstrate how any recommendations in the cultural impact assessment have been incorporated into the application.</p>	Allow
S310.007	Department of Conservation	Ch.7 Sch. Residential Zone Sch X. X6:	Support	<p>NMH supports the proposed amendments because these enhance the protection of indigenous vegetation within</p>	Allow

	310	<p>a) prohibit earthworks and vegetation clearance within the Significant Natural Area and</p> <p>b) amend the explanation to make it clear that these rules are to protect both landscape values and provide protection for significant indigenous biodiversity values within the SNA.</p>		the Significant Natural Area (SNA).	
S367.026	Save the Maitai Incorporated 367	<p>General - Private Plan Change 28: If PPC 28 is to be approved, the following changes are requested:</p> <p>aa. Require rainwater storage for each property.</p> <p>bb. Require greywater reuse.</p> <p>cc. Require passive house construction including: solar power production on each property, fresh air ventilation system, triple glazing, extra insulation, passive solar heating</p>	Support in part	Whilst NMH agrees in principle with requirements for rainwater storage for each property and requirements for greywater reuse for gardening, cleaning or toilet/laundry purposes. NMH does not support the use of rainwater for drinking water purposes unless there are no alternative reticulated options and only where suitable treatment is in place to render the water potable.	Allow with modifications
S198.005	Friends of the Maitai 198	<p>General - Private Plan Change 28: Private Plan Change 28 is rejected unless: The development is required to put in</p>	Support in part	Whilst NMH agrees in principle with requirements for rainwater storage for each property and requirements for greywater reuse for gardening, cleaning or toilet/laundry purposes. NMH does not support the use of rainwater for drinking water purposes unless there are no alternative	NMH retains a neutral position but requests amendments

		place suitable provisions for handling greywater, and rainwater storage and other measures to reduce the demand on the water supply.		reticulated options and only where suitable treatment is in place to render the water potable.	to this submission point
S328.010	Te Atiawa Trust 328	General - Private Plan Change 28: Work with iwi to support Cultural Health Indicator (CHI) monitoring of Kaka Stream.	Support	NMH supports Te Atiawa Trust's statement that Council work with iwi to support Cultural Health Indicator (CHI) monitoring of Kaka Stream as this aligns with the principle of Te Mana o te Wai.	Allow
S198.009	Friends of the Maitai	General - Private Plan Change 28: Private Plan Change 28 is rejected unless Steps are taken to ensure any impact of increased traffic on the lower Maitai Valley and Nile Street (including during construction) is consistent with best practices for active transport and for public safety.	Support in part	NMH agrees that it is critically important that active mode users, especially children who are travelling to school are protected from the impacts of increased traffic pedestrians and cyclists. NMH would like to see detailed design plans of the active transport network from the development into Nelson.	NMH retains a neutral position but supports the suggested requirement
S183.002	Bill Gilbertson 183	General - Private Plan Change 28: The applicant should prepare an assessment of the carbon produced for this proposal.	Support	NMH agrees that a carbon assessment should be produced as part of the proposal. As noted in the Ministry for Business, Innovations and Employment: <i>Whole of Life Embodied Carbon Emissions Reduction framework building for Climate Change Programme:</i> "New Zealand has committed to net zero carbon emissions by 2050. The Building and Construction Sector needs to play its part in meeting this goal as the Sector	Accept

					currently accounts for around 20% of New Zealand's carbon emissions, through the energy and materials used in buildings ² . It is important that the assessments are made to understand the development's carbon footprint, and whether measures need to be placed to mitigate any adverse effects from the onset.	
S367.021	Save the Maitai Incorporated 367	General - Private Plan Change 28: If PPC 28 is to be approved, the following changes are requested: Require improved riparian planting along all waterways to a minimum width of 50 metres.	Support in part	NMH supports requirements for improved riparian planting along all waterways. Improved riparian plantings it can decrease erosion and run-off while improving or maintaining the water quality, as well as health of plants, fish and animals living in and around the water. ³	Allow	
S367.018	Save the Maitai Incorporated 367	General - Private Plan Change 28: If PPC 28 is to be approved, the following changes are requested: 1. Identify and protect wetlands at the zoning stage	Support	NMH supports the identification and protection of wetlands at the zoning stage. This aligns with Policy 6 of the National Policy Statement for Freshwater Management: <i>"There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted."</i>	Allow	
S33.001	Royal Forest and Bird	General - Private Plan Change 28: We urge that consideration is given	Support in part	NMH agrees that it is critically important to protect the existing indigenous biodiversity in the area; to create and	Allow	

² [Whole-of-life embodied carbon emissions reduction framework \(mbie.govt.nz\)](https://www.mbie.govt.nz)

³ [Riparian planting and the effect of chemicals on waterways | EPA](https://www.epa.govt.nz)

	Protection Society 33	to the environment qualities of this region and that provision is made for the health of wetland and waterways, and native habitats for birdlife, lizards and insects.	protect biodiversity corridors including streams; protect any water bodies and enhance where possible; where there is development to use good subdivision practices such as swales, using stormwater to enlarge wetlands and landscape planting with natives.		
S290.001	Lindie Nelson 290	General - Private Plan Change 28: Taking early action to provide for effective public transport, especially along Maitai Valley Rd and Nile St, e.g., by designating a priority lane for public transport.	NMH agrees that it is important that effective public transport is available into the new areas at the early stages as this provides more choice	Support in part	Allow
S284.001	Brook Waimarama Sanctuary 284	General - Private Plan Change 28: We are very interested in plans that support suitable planting corridors to assist wildlife connecting to Nelson	NMH notes the importance of suitable planting corridors to assist wildlife connecting to Nelson and agrees that this should be factored into the development's design.	Support	Allow
S296.003,	Nelson Central School 296	General - Private Plan Change 28: The Private Plan Change 28 should consider the impacts of this development on the safety of school children, and their whānau.	Active transport to travel to or from school is an important way for children to get the recommended minimum of physical activity every day. As stated elsewhere in this submission, it is important that children's journeys are safe. When children have safe environments, this encourages them to walk and cycle which have positive health benefits.	Support	Allow
S296.006	Nelson Central School 296	General - Private Plan Improved walking and cycling linkages would be necessary to ensure safe passage for	NMH would like to see any walking and cycling infrastructure link with the local school network to	Support	Allow

S51.004	David Jackson 51	tamariki. Change 28: General - Private Plan Change 28: Add a rule that no solid fuel burners shall be installed in any building on any residential site within the Kaka Valley (this being defined as any site where natural water flows or would flow into Kaka Valley).	Support	ensure children can safely use active transport modes. NMH supports the recommendation that an additional rule is added that no solid fuel burners shall be installed in any building on any residential site within the Kaka Valley. Given the topography of Kaka Valley, there is the potential for air pollutants to be trapped in the valley. Modelling done for Plan Change A3 to the Nelson Air Quality Plan did not model scenarios that included fuel burners in this area as the land at the time was not zoned residential.	Allow
S310.004	Department of Conservation 310	General - Private Plan Change 28: Consider setting the high density residential and commercial zones back from the proposed open space zones where possible in order to minimise any effects on the value of the river corridor as an ecological linkage.	Support	NMH supports this recommendation to increase setbacks to ensure that residential and commercial areas do not have an adverse effect on the flora and fauna of the river corridors.	Allow
S310.002	Department of Conservation 310	General - Private Plan Change 28: That there is a further detailed assessment of the significance of indigenous biodiversity of the Kaka Hill site through surveys and applying appropriate criteria for the determination of areas/values of significance which require protection. This assessment should be made a	Support	NMH supports the recommendation for a further assessment of the indigenous biodiversity as this will enable decision makers more data on the specific flora and fauna of the area and decide what level of protection is require to enhance indigenous ecosystems and species appropriately.	Accept

S299.002-3	Fire and Emergency New Zealand 299	requirement of resource consent application for subdivision. General - Private Plan Change 28: Fire and Emergency is engaged to ensure that Emergency access is provided through the Private Plan Change 28 area; Firefighting water supply and access to that supply is provided to all new developments and subdivisions within the Private Plan Change 28 area in accordance with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.	Support	NMH supports the proposed amendment to ensure that firefighting water supply and access to that supply is provided to all new developments and subdivisions.	Accept
S376.003	Ministry of Education 376	General - Private Plan Change 28: that there is engagement to ensure that the proposed shared cycle path is appropriately designed to be safe for school staff and students travelling to and from schools.	Support	NMH supports this recommendation for ongoing engagement to ensure that the path is appropriate designed to be safe for staff and students.	Allow
S376.004	Ministry of Education 376	General - Private Plan Change 28: That the cycle connections at the Nile Street East and Maitai Road Intersection is implemented prior to	Support	NMH supports this recommendation as it ensures safe transport connections for school staff and students which encourages active travel.	Allow

		development of the PCA.			
S320.003	Waka Kotahi NZ Transport Agency 320	General - Private Plan Change 28 Further assessment of the demand/requirement for greenfield development of this scale and how staging of the development can integrate with infill / intensification of existing urban areas and infrastructure. This could be done via the FDS review process or by the applicant using the information gathered from the FDS process to undertake their own assessment so that any development can be staged accordingly.	Support	NMHI agrees with the recommendation. intensification alone cannot meet the demand for housing in the region, therefore any greenfield development needs to be timed appropriately, and staged, with priority given to high density residential housing close to existing urban areas and the associated infrastructure and services. Progressing this Plan Change could reduce the attractiveness of intensification of the existing urban area.	Allow
S320.004	Waka Kotahi NZ Transport Agency 320	General - Private Plan Change 28 Higher density residential development should be prioritized, with maximum site size included in the zoning (rather than just minimum) to ensure the desired high intensity residential development takes place.	Support	NMHI agree that higher density development should be prioritised as these provide viable options for reducing emissions and promote active modes of travel.	Allow
S320.005	Waka Kotahi NZ Transport	General - Private Plan Change 28: that the information provided as part	Support	NMHI agrees with Waka Kotahi that more detail needs to be provided regarding the proposed key walking and	Allow.

<p>Agency 320</p>	<p>of the plan change could better define the key walking and cycling links including:</p> <ul style="list-style-type: none"> • Identification of the level of service of the walkway / cycleways road allocation and intersection design • How walking and cycling networks safely connect with existing networks outside the development. • Alignment of with planned infrastructure projects and programmes. • Space for future public transport and active modes and linking to places people want to go. • How greenhouse gas emissions could be reduced by enabling active mode and public transport links. • How the design accommodates, enable and enhance public transport services in and around the area. • Maximum lot size needed to ensure the desired density of housing to support public and active transport comes to fruition. 	<p>cycling links, also further detail on the ability of the current active transport infrastructure to deal with extra trips associated with the development need to be included.</p>	
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