

# **Further submission on Proposed Marlborough Environment Plan**

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## Further submitter details and request to accept late submission

1. Nelson Marlborough Health (NMH) (Nelson Marlborough District Health Board) makes the further submissions on the Marlborough District Council (MDC) Proposed Marlborough Environment Plan (PMEP) set out in the attached document.
2. NMH requests that the Decision Making Committee for the PMEP accepts this late submission. As MDC were advised on 22 June 2017, NMH required extra time to assess and respond to any actual or potential facility and service implications of a submitter's request to include one of its buildings in the Heritage Resource schedule of the MEP.
3. 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, such as the Wairau Hospital and community support services (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
  - interest in the operation of other healthcare services and facilities outside those administered by NMH but which contribute to the efficiency and effectiveness of the public health system as a whole, including those associated with emergency services, general practices, and community support services.
4. NMH **would like to be heard** in support of its submission.
5. As previously requested in its initial submission on the PMEP, NMH would also like an opportunity to meet with MDC (prior to the hearing) to discuss management of the Wairau Hospital site under the MEP.

Yours sincerely



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**Appendix I – Further submissions of Nelson Marlborough Health (NMDHB) on the Proposed Marlborough Environment Plan**

Name of submitter / Submission No.	Submission Point	Relief sought by submitter	Support / Oppose	Reason	Allow / Disallow
Heritage New Zealand Pouhere Taonga (768)	74 & 32	<p>That the Wairau Public Hospital Nurses' Home (Former) is added to Schedule 2 of Category 2/B Heritage Resources.</p> <p>That the following policy is included:  <b>Policy 10.1.X – Avoid adverse effects on historic heritage values from the destruction, demolition or partial demolition of Category B heritage resources identified in Schedule 2 of Appendix 13, except where the item is of danger to public safety and repair is not the best practicable option after having regard to the matters in Policy 10.1.7.</b></p>	Oppose	<p>Inclusion of the former nurses' home in the MEP would lead to unnecessary processes and costs. In the event that the building is scheduled in the MEP, NIMH notes that resource consent will be required for works other than repair or maintenance.</p> <p>The building, which is cordoned off, is deemed to be a significant risk to public health and safety due to fire and seismic risk and asbestos building materials.</p> <p>The repair works and associated costs required to bring the building up to standard are extensive and not economically viable.</p> <p>NIMH also opposes the policy recommended by Heritage New Zealand (submission point 32) insofar as it affects the former nurses home. Additionally, NIMH wishes to ensure that any 'catch-all' policy in the MEP does not capture the building as a heritage resource and / or that it is explicitly excluded.</p>	Disallow
New Zealand Fire Service Commission (993)	1	<p>Amend the explanatory text to Issue 4B to include the following additional paragraph:  <b>Emergency services are essential to the on-going health, safety and wellbeing of the Marlborough community. It is therefore important that emergency services are able to operate, upgrade and develop efficiently and effectively in a manner that responds to community needs without unnecessary constraints.</b></p>	Support in part	<p>In its original submission on the PMEP NIMH sought that the explanation to Issue 4B recognised 'healthcare services and facilities' (suggested definition provided) as regionally significant infrastructure.</p> <p>NIMH supports the text suggested by the New Zealand Fire Service Commission with the following amendments to reflect this:  <b>Emergency services and healthcare services are essential to the on-going health, safety and wellbeing of</b></p>	Allow in part

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New Zealand Fire Service Commission (993)	2	<p>Amend the Objective and Policies that respond to Issue 4B to as follows:</p> <p><b>Objective 4.x Efficient and effective development and operation of emergency services</b></p> <p><b>Support and protect the health, safety and wellbeing of the Marlborough community by enabling efficient and effective emergency services</b></p> <p><b>Policy 4.x.1 Recognise the essential nature of emergency services by:</b></p> <p><b>(a) providing for the development and on-going use of emergency service facilities;</b></p> <p><b>(b) requiring adequate property access for emergency vehicles and appropriate access to, and supplies of, firefighting water; and</b></p> <p><b>(c) enabling emergency services training activities.</b></p> <p><b>The policy recognises that emergency service facilities; emergency services training; and the need for adequate access and water supply for emergency response purposes is essential for the health, safety and wellbeing of people and communities. The policy provides</b></p>	Support in part	<p>the Marlborough community. It is therefore important that emergency services <b>and healthcare services and their associated facilities and activities</b> are able to operate, upgrade and develop efficiently and effectively in a manner that responds to community needs without unnecessary constraints.</p> <p>NIMH supports standalone policy that recognises and provides for emergency services but considers that this should be expanded to include healthcare services and associated facilities and activities given their equal importance to the health, safety and wellbeing of the Marlborough community.</p> <p>Therefore, NIMH suggests the following amended wording:</p> <p><b>Objective 4.x Efficient and effective development and operation of emergency services <u>and healthcare services</u></b></p> <p><b>Support and protect the health, safety and wellbeing of the Marlborough community by enabling efficient and effective emergency services <u>and healthcare services and their associated facilities and activities</u></b></p> <p><b>Policy 4.x.1 Recognise the essential nature of emergency services <u>and healthcare services</u> (a) by providing for the development and on-going use <u>operation</u> of emergency service <u>and healthcare service facilities and activities including, but not necessary limited to:</u></b></p> <p><b>(a)</b> requiring adequate property access for emergency vehicles and appropriate access to, and supplies of, firefighting water;</p> <p><b>(b)</b> <u>enabling noise and other effects associated</u></p>	Allow in part

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New Zealand Fire Service Commission (993)	10	<p>for emergency services, and associated activities, throughout Marlborough.</p> <p>Amend Policy 12.3.2 as follows:  Provide for appropriate community-based facilities <b>and</b> emergency service facilities to locate within residential environments where they meet a community need and are in keeping with the expected residential character and amenity values for Urban Residential Zones.  <b>E</b>mergency service facilities and community-based activities, including both community facilities (e.g. health, education and spiritual) and recreational activities (e.g. playgrounds) play an important role in providing for the day-to-day needs of residents. ...</p>	Support	<p><u>with emergency sirens and aircraft</u>; enabling emergency services training activities; <u>enabling discharges to air associated with healthcare facility heating appliances; and enabling the upgrade or development of facilities to cater for the population's changing needs.</u></p> <p>The policy recognises that emergency services <b>and healthcare services</b> facilities; emergency services training; <u>and the need for adequate access and water supply for emergency response purposes is are</u> essential for the health, safety and wellbeing of people and communities. The policy provides for emergency services <b>and healthcare services, and their associated facilities and activities, throughout Marlborough.</b></p> <p>As previously noted, NMH has an interest in the operation of other healthcare services and facilities outside those administered by NMH but which contribute to the efficiency and effectiveness of the public health system as a whole, including those associated with emergency services.</p>	Allow

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Chorus New Zealand Limited (464), Spark New Zealand Trading Limited (1158)	15, 13	That Objective 11.1 is amended as follows: <i>Reduce the risks to life, and property and regionally-significant infrastructure from natural hazards.</i>	Support	Additional to regionally significant infrastructure, natural hazard risks should also be reduced on the property of individuals and the community in order to protect public health and wellbeing.  This would also ensure consistency with the explanation to Objective 11.1.	Allow
Federated Farmers of New Zealand (425)	200	That a policy is added under Objective 11.1 which reads as follows: <b>Assess the consequences of natural hazard events on Marlborough's human communities, including by considering:</b> a) <i>The nature of activities in the area;</i> b) <i>Individual and community vulnerability;</i> c) <i>Impact on individual and community health and safety;</i> d) <i>Impact on social, cultural and economic wellbeing;</i> e) <i>Impact on infrastructure and property, including access and services;</i> f) <i>Risk reduction and hazard mitigation measures;</i> g) <i>Lifeline utilities, essential and emergency services, and their co-dependence;</i> h) <i>Implications for civil defence agencies and emergency services;</i> i) <i>Cumulative effects;</i> j) <i>Factors that may exacerbate a hazard event;</i> k) <i>The costs (including to</i>	Support in part	NIMH agrees that this is a gap within the PMEP but believes that such a policy would better sit under Objective 11.2 – 'Natural hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events'.  NIMH considers that the policy should also be expanded to assess the risk on property and the environment in accordance with the RMA.  NIMH suggests the following wording:  <b><u>Ensure structural works or other activities do not increase the risk or consequences of natural hazard events on people, property and the environment of Marlborough's human communities, including by considering:</u></b> a) <i>The nature of activities in the area;</i> b) <i>Individual and community vulnerability;</i> c) <i>Impact on individual and community health and safety;</i> d) <i>Impact on social, cultural and economic wellbeing;</i> e) <i>Impact on the environment, infrastructure and property, including access and services;</i> f) <i>Risk reduction and hazard mitigation measures</i>	Allow in part



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Woodburners Unite (concerned Residents Group) (1239)	6	<p>(landowners) of mitigating the hazard.</p> <p>That PM<sub>2.5</sub> is used as a measure for ambient air quality instead of PM<sub>10</sub>.</p>	Support in part	<p><u>including their cost or benefit to people and the community:</u></p> <p>g) Lifeline utilities, essential and emergency services, and their co-dependence;</p> <p>h) Implications for civil defence agencies and emergency services;</p> <p>i) Cumulative effects;</p> <p>j) Factors that may exacerbate a hazard event;</p> <p>k) <del>The costs (including to landowners) of mitigating the hazard.</del></p> <p>NMH considers that both PM<sub>10</sub> and PM<sub>2.5</sub> should be used for monitoring purposes to provide a complete picture of ambient air quality and associated potential health effects, and align with existing PM<sub>10</sub> national monitoring requirements.</p> <p>Exposure to air pollution from open fires and wood burners is associated with increased respiratory symptoms such as coughing and wheezing, increased winter hospital admissions for respiratory and cardiovascular illnesses, and reduced life expectancy.<sup>1</sup> The pollutants of primary concern are particulates PM<sub>10</sub> and PM<sub>2.5</sub>. These particles cause health effects, especially over the long term. There is a substantial body of evidence on the health effects of inhaling particulate matter with the smaller PM<sub>2.5</sub> particles being more significant due to their ability to penetrate deeper into the lungs.<sup>1</sup></p>	Allow in part

<sup>1</sup> Kuschel G, Metcalfe J, Wilton E, Guria J, Hales S, Rolfe K, Woodward A. 2012. *Updated health and air pollution in New Zealand study*. Volume 1: Summary report. Prepared for Health Research Council of New Zealand, Ministry of Transport, Ministry for the Environment and New Zealand Transport Agency.

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Department of Conservation (479), Environmental Defence Society Incorporated (698)	120, 92	That Objective 15.1a is amended to ensure that the water quality of rivers and lakes as well as coastal waters / beaches is suitable for contact recreation.	Support	To protect public health and provide for recreational opportunities.	Allow
The Fertilizer Association of New Zealand (1192)	14	That Objective 15.1a is amended as follows: ... <i>(d) groundwater quality meets the NZ Drinking Water Standards for New Zealand 2005 (Revised 2008). is suitable for drinking.</i> ...	Oppose in part	The requirements for meeting the New Zealand Drinking Water Standards for New Zealand 2005 (Revised 2008) are onerous in nature and therefore may not be suitable for general policy.  NMH suggests that the following wording may be more suitable: <b>Determinands of health significance in groundwater are below the Maximum Acceptable Values specified within the Drinking Water Standards for New Zealand 2005 (Revised 2008)</b>	Disallow in part
Department of Conservation (479)	138	That Policy 15.1.19 is amended as follows: <i>Progressively work toward eliminating the existing discharge of human sewage to coastal waters in the Marlborough Sounds, and improvement in the discharge from with-the-exception-of regionally significant infrastructure.</i>	Support in part	In striving for better public health and environmental outcomes NMH considers that the discharge of all human sewage to water should either be eliminated or, where this is not practicable, continually improved and that municipal discharges should not be exempt.  However, to ensure consistency, NMH acknowledges that the policy needs to be written in a way that excludes vessels where environmental outcomes and other policy/regulations allow for these discharges.	Allow in part
Department of Conservation (479)	254	Amend permitted activity standard 19.3.15 to include the following standard: <b>Any spray drift resulting from the discharge is contained within the boundary of the property.</b>	Support	Discharges of agrichemicals into air or onto land need to be managed so as to not give rise to public health or nuisance effects.	Allow