

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
Form 5



## SUBMITTER DETAILS

Full Name or Name of Agent  
(if applicable):

**Jitender Arora**

Address for service of  
Submitter

**23 A Forth Street, Invercargill 9810**

Organisation name

**Public Health South**

Mobile

**02745**

Email address

**Jitender.Arora@Southernhdhb.govt.nz**



## SCOPE OF SUBMISSION

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

Plan Change 1

Plan Change/Variation Name

Te Puawai

The specific provisions that my submission relates to are:

*(Please identify the specific parts of the proposed plan change/variation)*

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

**see attached document**



## SUBMISSION

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above:

☐

I oppose the specific provisions identified above:

☐

I wish to have the provisions identified above amended:

YES ☐ NO ☐

The reasons for my views are:

See attached document

I seek the following decision by Council:

Accept the proposed plan change / variation

☐

Accept the proposed plan change / variation with amendments as outlined below

☐

Decline the proposed plan change / variation

☐

If the proposed plan change / variation is not declined, then amend it as outlined below

☐

See attached document

I wish to be heard in support of my submission

☒

I do not wish to be heard in support of my submission

☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing

☐

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐/could not ☒ gain an advantage in trade competition through this submission.

If you *could* gain an advantage in trade competition through this submission please complete the following:

I am ☐/ am not ☒ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Signature of Submitter  
(or person authorised to sign on behalf of the submitter)

**22/07/2021**

Date

## NOTE TO PERSON MAKING A SUBMISSION:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Please also provide a contact phone number so we can contact you for hearing schedules (where requested).

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious:
- It discloses no reasonable or relevant case:
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- It contains offensive language:
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**SUBMISSION ON A NOTIFIED PROPOSED PLAN CHANGE UNDER CLAUSE 6 SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

**To:** Invercargill City Council

**This is a Submission by:** Public Health South on behalf of Southern District Health Board

1. This is a submission on the change proposed to the Invercargill City District Plan (the proposal) Proposed Plan Change 1 – Te Puawai.
2. Public Health South (PHS) is not a trade competitor for the purposes of s.308B of the Act.
3. The broad reason for these submissions is to provide objective and independent input to promote the reduction of adverse effects on the health of people and communities pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
4. Public Health South (PHS) has statutory obligations for public health within this area under Crown funding agreements between the Ministry of Health and the Southern District Health Board. The Ministry of Health requires public health services to advocate for the reduction of any potential health risks that are due to decisions made by local authorities. This can include making submissions on Proposed Policy Statements, Plans, including Changes or Variations to Changes. The proposal covers matters with potential health effects on people and communities.
5. The specific parts of PC1 to which this submission relates to include:
  - a) Air Quality
  - b) Community Connectedness
  - c) Active Transport
  - d) Stormwater Management
  - e) Warmer Homes
  - f) Safer Communities.

These provisions are shown in the attached schedule including whether we support, oppose or are neutral regarding the specific parts or wish to have them amended, and our reasons are stated.

Air Quality

6. The Southern District Health Board considers air quality to be a key determinant of health and wellbeing. We recognise that among air pollutants, particulate matter (PM 10 and PM 2.5) has the greatest impact on health in our population. The main sources of PM2.5 in the Southern district are home heating, vehicles and industry. Outdoor burning also contributes, but to a lesser extent. We acknowledge that fine particle air pollution (such as PM2.5) is most harmful when people are exposed to it over long periods of time. Potential health effects include cancer, respiratory disease and cardiovascular disease. Poor air quality also affects health by restricting people's ability to engage in their usual activities, such as work or recreation. It is widely accepted that there is no evidence of a PM threshold below which no adverse effects occur. We advocate that collaboration across sectors is needed to encourage cleaner forms of heating to achieve mutually desirable aims of warmer homes and cleaner air.

### Community connectedness

7. PHS recommends that extending public transport to service this development is regarded as a priority. A consideration to reduce speed zones within the higher density central core housing area to 30k/h, and on existing roads particularly those that connect to the subdivision such as Tramway Road to 50k/h. Traffic calming measures should be deployed in the subdivision and on existing roads close to the subdivision to facilitate speed reduction.

### Active Transport

8. Active transport contributes to improved public health outcomes because of its positive effects on physical and mental health, increasing social connectedness and sustainability. Active transport has no carbon footprint and contributes to a healthier environment for the future.

PHS recommends:

- Improving pedestrian infrastructure by ensuring footpaths are safe and accessible to all and by increasing pedestrian crossings (zebra crossings rather than courtesy crossings).
- Improving cycling infrastructure by promoting safe, accessible and connected cycling networks.

### Stormwater Management

9. Improperly managed stormwater from urban environments can lead to a number of potential public health risks including inadvertent contamination of the sewage infrastructure (and vice versa) as well as contaminants from the urban environment itself. These can include grit, washings from vehicles and other outdoor transportation devices, oil, brake products, and tyre wear etc. We recommend that stormwater is appropriately treated and can be attenuated by soils before it is discharged to any waterway.

### Warmer Homes

10. The housing environment is a key setting with impacts on human health and recognises the links between housing and health. The increasing body of evidence which shows an association between housing quality and morbidity from infectious diseases, chronic illnesses, poor nutrition, and poor mental health. We recognise that the impacts of cold homes on health include excess mortality from cardiovascular and respiratory disease amongst the elderly, increased respiratory problems in children, increased illnesses such as colds and influenza, mental health problems, and the exacerbation of existing conditions such as arthritis and rheumatism. It is acknowledged that that a warm home is vital for comfort and good health whilst recognising that many New Zealand homes tend to be cold, with temperatures regularly falling below the World Health Organization's recommendations. World-leading New Zealand research has been able to show that improved health outcomes can be achieved through housing improvements and appropriate building standards that are in excess of current New Zealand building standards. Southern DHB considers that housing is a human right and is much more than simply a right to shelter, but also the right to have somewhere to live that supports good health outcomes. We therefore acknowledge the inextricable link between the right to housing and the need for warm and dry, affordable, culturally appropriate and accessible housing that is part of a wider community with easy access to essential services within a healthy environment.

### Safer Communities

11. We recommend the promotion of environments that protect and encourage public health and wellbeing as an objective of planning.

12. It is recommended measures are put in place to control the location, density and operating hours of specific retail outlets and entertainment providers such as liquor or tobacco outlets, fast food outlets and gambling venues.
13. The decision we seek from the Council for each submission point is set out in the attached schedule together with more precise details. Where we seek amendment to the proposals by stating new words to be inserted into the provisions, or seek amendment to the wording of specific parts, we assert that the scope of our submission is intended to also cover words to the like effect in the specific part or elsewhere in the proposal or otherwise in the Policy/Plan, which might be consequentially added or amended.
14. We attach in a Schedule how that provision in the proposal should be modified.
15. This submitter wishes to be heard in support of these Submissions at any hearing but is not prepared to consider presenting a joint case with other submitters. This submitter is willing to participate in any pre-hearing conferences, or mediation.

Date 15<sup>th</sup> day of July 2021

Signed  \_\_\_\_\_

Name: Jitender Arora

a person authorised to sign on behalf of Public Health South, Southern District Health Board.

**Address for service**

Contact person: Jitender Arora

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23 A Forth Street,

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## SCHEDULE OF SUBMISSIONS BY PUBLIC HEALTH SOUTH

### Submission 1

<b>Provision</b>	Objectives-RES1BZO1-O3
<b>Position:</b> Support	
<b>Submission:</b> There are public health consequences associated with lack of housing. Poor housing conditions are associated with a wide range of health conditions, including respiratory infections, asthma, lead poisoning, injuries, and mental health. Addressing housing issues offers public health practitioners an opportunity to address an important social determinant of health.	
<b>Decision Requested:</b> Should PC 1 be confirmed, incorporate Res1BZO1-O3 in its current form.	

### Submission 2

<b>Provision</b>	Policies – RES1BZ –P3 (2) Urban Design
<b>Position:</b> Support in part	
<b>Submission:</b> Connectivity - how the development links to the neighbourhood and the wider community.	
<b>Decision Requested:</b> Should PC1 be confirmed, we recommend that to align the connectivity of this subdivision with wider part of the community the wording is strengthened to provide an indication as to how the connectivity will be achieved. This will need to include public and active transport modes.	

### Submission 3

<b>Provision</b>	Policies – RES1BZ -P3 Urban Design
<b>Position:</b> Support in part	
<b>Submission:</b> The design issues list needs to include a clause that ensures homes are warm and healthy. The current building standards need to be seen as a minimum standard and as we are talking about New Zealand's southernmost city, a higher standard of building design needs to be adopted to provide for warmer homes.	
<b>Decision Requested:</b> Should PC 1 be confirmed, inclusion of: Warmer homes – All homes built in this development need to incorporate the design elements of the New Zealand Green Building Council's Home star rating of 8 or better, or a of a suitable standard that achieves an equivalent outcome.	

#### Submission 4

Provision	Policies – RES1BZ -P3 Urban Design
<b>Position:</b> Support in part	
<b>Submission:</b> The design issues list needs to include a clause that ensures homes are heated with appropriate wood burners or other clean heating devices. South Invercargill is a gazetted airshed that from time to time has exceedances of the National Environmental Standard for Air Quality. Any home heating devices that are installed should not contribute to these exceedances	
<b>Decision Requested:</b> Should 1 be confirmed, inclusion of: Clean Air – All home heating devices should be either emission free or of a standard that would meet the Ministry for the Environment’s wood burner standards of the National Environmental Standard for Air Quality and have a discharge of less than 1.5 grams of particles for each kilogram of dry wood burned (g/kg) and a thermal efficiency of at least 65 per cent.	

#### Submission 5

Provision	Te Puawai Master Plan-SubR14 (1)
<b>Position:</b> Support in part	
<b>Submission:</b> Active transport contributes to improved public health outcomes because of its positive effects on physical and mental health, increasing social connectedness and sustainability. Active transport has no carbon footprint and contributes to a healthier environment for the future.	
<b>Decision Requested:</b> Should PC1 be confirmed, PHS strongly recommends this clause is strengthened to the effect that it incorporates some performance standards relating to active transport that in effect: “ensure footpaths are safe and accessible to all and having pedestrian crossings (zebra crossings rather than courtesy crossings). Also, consider cycling infrastructure that would promote safe, accessible cycling, and is connected to existing cycling networks”.	

#### Submission 6

Provision	RES1Z-R26 (5)(2) -Te Puawai Retirement Village design standards
<b>Position:</b> Support	
<b>Submission:</b> Integration of access, parking areas and garages in a way that is safe for pedestrians and cyclists, and does not visually dominate the development, particularly when viewed from the street or other public spaces	
<b>Decision Requested:</b> Should PC1 be confirmed, PHS strongly recommends incorporating RES1Z-R26 (5)(2) in its current form.	



### Submission 7

<b>Provision</b>	RES1Z-R26 (5)(5) Te Puawai Retirement Village design standards
<b>Position:</b> Support	
<b>Submission:</b>  Incorporation of Crime Prevention Through Environmental Design (CPTED) principles, including effective lighting, passive surveillance, management of common areas and clear demarcation of boundaries and legible entranceways.	
<b>Decision Requested:</b>  Should PC1 be confirmed, PHS strongly recommends incorporating RES1Z-R26 (5)(5) in its current form.	

### Submission 8

<b>Provision</b>	RES1Z-R26 (5)(8) -Te Puawai Retirement Village design standards
<b>Position:</b> Support in Part	
<b>Submission:</b>  Where practicable, incorporation of environmental efficiency measures in the design, including passive solar design principles that provide for adequate levels of internal natural light and ventilation.	
<b>Decision Requested:</b>  Should PC1 be confirmed, PHS strongly recommends strengthening RES1Z-R26 (5) (8) by incorporating words to the effect of "all homes will need to incorporate the design elements of the New Zealand Green Building Council's Home star rating of 8 or better, or a of a suitable standard that achieves an equivalent outcome".	

### Submission 9

<b>Provision</b>	Outdoor Living RES1BZ-R7 (4)
<b>Position:</b> Support	
<b>Submission:</b>  Outdoor living spaces shall not be occupied by parking, manoeuvring, or vehicle access areas.	
<b>Decision Requested:</b>  Should PC1 be confirmed, PHS strongly recommends that having separate outdoor space distinguished from other activities will ensure definite space for outdoor purpose. Therefore, we support the incorporation of RES1Z-R7 (4) in its current form.	