

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

**To:** Manawatu District Council.

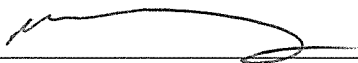
**This is a Submission by:** Public Health Services, MidCentral District Health Board

**Submission on:** Proposed Plan Change 51: Growth Precinct 4 and new District Plan Structure.

1. This submitter is not a trade competitor for the purposes of s.308B of the Resource Management Act 1991.
2. 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.
3. MidCentral Public Health Service (MCPHS) has statutory obligations for public health within this area under Crown funding agreements between the Ministry of Health and the MidCentral District Health Board. The Ministry of Health requires public health services to reduce any potential health risks by means including submissions on any Proposed Policy Statements, Plans, including Changes or Variations to Changes thereto concerning matters of public health significance that are considered by the local authority. The proposed plan change covers matters with potential health effects on people and communities.
4. The specific parts of the Proposed Plan Change 51: Growth Precinct 4 and new District Plan Structure to which this Submission relates are shown in the attached schedule including whether we support, oppose or are neutral regarding the specific parts or wish to have them amended.
5. The decision we seek from the Council for each submission point is set out in the attached schedule together with 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, our Submissions are intended to also cover words to the like effect in the specific part, or elsewhere in the proposal or in the Policy/Plan, which might be consequentially added or amended;
6. We attach in a Schedule, how that provision in the proposal should be modified.
7. 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: 31 day of May 2019.

Signed \_\_\_\_\_



Name: Dr Robert Holdaway

A person authorised to sign on behalf of MidCentral District Health Board, MidCentral Public Health Service.

**Address for service**

Contact person: Robert Holdaway

Email: robert.holdaway@midcentraldhb.govt.nz

Telephone: 06-3509110

Postal address: MidCentral Public Health Service  
Private Bag 11036  
Palmerston North

**SCHEDULE OF SUBMISSIONS BY MidCentral Public Health Service (MCPHS)**

**1. Submission <sup>1</sup>**

<b>Submission relates to this specific part of proposal</b>	Chapter 15 Residential Zone 15.4.2 Standards for Permitted Activities – Dwellings and Accessory Buildings, k. Earthworks
<p><b>Regarding this part, we wish to amend this part</b></p> <p><b>For the following reasons:</b></p> <p>Existing residential properties neighbour precinct 4’s boundaries. As staged development is proposed, occupied residences will neighbour subdivision areas/ sections as they are developed and as earthworks occur. Subdivision earthworks could expose neighbouring residents to construction dust containing particulate matter including PM10 that can cause a nuisance as well as adverse health effects. Health effects caused by PM10 range from minor effects, such as nose and throat irritation, to more serious effects such as aggravation of existing respiratory and cardiovascular disease and premature death.</p> <p>PM10 is a non-threshold contaminant. Any increase in ambient concentrations will result in adverse effects. This means that the air quality criteria for PM10 should not be used as a limit to pollute up to. Wherever possible, PM10 levels should be minimised or eliminated.</p>	
<p><b>The recommendation sought is amend this provision as follows:</b></p> <p>MCPHS support provision 15.4.2, k) being retained for all subdivision earth-works within precinct 4 to minimise or eliminate exposure of neighbouring residents to PM10 and other particulate matter in construction dust. MCPHS support strict adherence for all subdivision and site development within precinct 4 to rule 3D4.2.b for all earthworks.</p> <p>In addition to 15.4.2, k), MCPHS recommend that the following consent condition for subdivisions and site development is included in 15.4:</p> <p>‘There shall be no noxious, dangerous, objectionable or offensive dust to the extent that it causes an adverse effect at or beyond the boundary of the site’</p> <p>This is a recommended condition for managing off-site effects of dust in the Ministry for the Environment’s 2016 publication ‘Good Practice for Assessing and Managing Dust.’</p>	

**2. Submission <sup>2</sup>**

<b>Submission relates to this specific part of proposal</b>	Precinct 4 Structure Plan Report, Feilding, 5.2 Land Contamination Assessment.
<p><b>Regarding this part, we oppose this proposal.</b></p> <p><b>For the following reasons:</b></p> <p>Land contamination analysis was only commissioned for the one site, Lot 146 DP 3479, 54 Roots Street, Feilding. The Precinct 4 Structure Plan Report notes this is the major landholding within Precinct 4. Although 54 Roots Street is the major landholding in Precinct 4, Lot 146 is a small portion of 54 Roots Street. Lot 146 DP 3479 represents a very small portion (approx. 2000m<sup>2</sup>) of precinct 4 (256ha). Precinct 4 land not part of Lot 146 DP 3479 was outside scope of the Opus report. There appears to be no comprehensive</p>	

rationale or justification provided as to why analysis of that site meets Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 requirements in the section 32 report.

The Opus detailed site investigation report recommended that a preliminary site investigation is undertaken across the property title block beyond the piece of land analysed in their report. That recommendation is not included in the Precinct 4 Structure Plan Report, Feilding, 5.2 Land Contamination Assessment.

5.2 Land Contamination’s summary of Opus’s Lot 146 DP3479 contaminated land report contradicts the recommendations of the Opus report. 5.2 states that the site is suitable for residential use and no remediation action was required. The Opus report recommendations include :

- Residential development around TP2 should be avoided or the site remediated.
- For any development to be considered, on-site remedial options should be considered to remove contaminated materials and provide appropriate conditions for development.

Page 27 of the section 32 report states that further testing was undertaken by Mr Bergin, the author of the detailed site investigation report, that found contamination within the levels for residential development. There appears to be no evidence of such testing or any new or amended report from Mr Bergin to confirm that statement included in the section 32 report.

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 require section (8)(4) to be met for subdivision or changing use of land to be a permitted activity. The Opus detailed site report did not conclude that all aspects of Section (8), (4) were met for Lot 146 DP3479 or Precinct 4.

Future residents could be exposed to contaminants in the soil that could have adverse health effects if development occurs on Lot 146 DP3479 without remediation or if other contaminated sites exist in Precinct 4 that are not identified prior to subdivision and residential development of precinct 4.

**The recommendation/decision sought is amend this provision as follows:**

That Chapter 15, Residential Zone, is amended to include rules for future subdivision within Precinct 4 site assessment that meet The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 requirements of Section (8), (4) or section (9), (3) & (4) .

That recommendations pertaining to Lot 146 DP3479, 54 Roots Street, Feilding in Opus’s detailed contamination report are required to be met prior to any subdivision of that lot.

**3. Submission <sup>3</sup>**

<b>Submission relates to this specific part of proposal</b>	Precinct 4 Structure Plan
<p><b>Regarding this part, we wish to amend this part</b></p> <p><b>For the following reasons.</b></p> <p>The structure Plan shows the proposed recreation reserve ending at Port St East. Extending the walkway would connect the reserve with the remainder of the town, improving the connectivity and amenity value of the reserve. Linking the proposed</p>	

reserve to the Green Spine would help make the development meet NZTA principles for cycling and walking and may improve the ability of the Council to access NZTA support. (<https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance>).

**The recommendation/decision sought is amend this provision as follows:**

That Precinct 4 Structure Plan extend the proposed Makino Stream Reserve so that it connects with the green spine thus providing a connected walking and potential cycling route to existing walking and cycling paths.

4. Submission <sup>4</sup>

<b>Submission relates to this specific part of proposal</b>	Proposed Plan Change 51 – Growth Precinct 4 and new District Plan Structure (PPC51) – rezoning of Rimu Park
<p><b>Regarding this part,</b> we wish amendment to this part.</p> <p><b>For the following reasons:</b> Development of precinct 4 has the potential to significantly increase the number of properties in Feilding and therefore increase demand for use of recreation reserves such as Rimu Park – it therefore seems poor logic to rezone this park as residential without the provision for appropriately sized additional green space beyond what is required under MDC rules around Makino Stream..</p> <p>Green spaces are very important for health, both physical and mental, providing areas for people to play, relax and exercise. Lack of exercise is a contributing factor to the rise in obesity, which in turn leads to adverse health outcomes. This is particularly important given the trend for smaller urban properties, which may not have sufficient space for children play, kick a ball etc.</p> <p>Research shows that parks most likely to improve health are of high quality, readily accessible and well connected with strong input from the local community in their development. It is our belief that urban planners should take every opportunity to maximize green spaces and to ensure that they are designed in conjunction with local communities.</p> <p>The proposed reserve neighbouring the Makino Stream would offer a very different form of recreation opportunity from Rimu Park. If the Feilding population significantly increases - then playing fields/open spaces such as those offered by Rimu Park would be of greater value due to increased demand which could not be met by strip reserves besides the Makino Stream even with the addition of a proposed smaller park on Roots St East.</p>	
<p><b>The recommendation/decision sought is amend this provision as follows:</b></p> <p>That Rimu Park not be rezoned residential until a park meeting similar recreational needs and that offers more recreational opportunities is developed.</p>	

