

Submission on notified proposal for plan change



About preparing a submission on a proposed plan

You must use the prescribed form

- [Clause 6](#), Schedule 1 of the Resource Management Act 1991 (RMA) requires submissions to be on the prescribed form.
- The prescribed form is set out in [Form 5](#), Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
- This template is based on Form 5. While you do not have to use this template, your submission must be in accordance with Form 5.

Your submission and contact details will be made publicly available

- In accordance with [clause 7](#) of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under [clause 8A](#) of Schedule 1 of

change

the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to

- [Section 352](#) of the RMA allows you to choose your email to be withheld from being publicly available. To choose this option, select the relevant boxes below.

Reasons why a submission may be struck out

Please note that your submission (or part of your submission) will be struck out if the authority is satisfied that at least one of the following applies to your 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 part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent evidence, but has been prepared by a person who is not a qualified expert who does not have sufficient specialised knowledge or experience to give advice on the matter.

To Kāpiti Coast District Council

Submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Council Plan 2021

Submitter details

Full name of submitter: Amanda Jane Savage (Mandy), Cancer Society of NZ (Wellington Division)

Contact person (name and designation, if applicable): Mandy Savage, Centre Co-ordinator and Senior Health Promotions Co-ordinator

Postal address (or alternative method of service under section 352 of the RMA):
Cancer Society's Kapiti Support Centre, 27 Kapiti Road, Paraparaumu, 5032

Telephone: 027 260 1502

Electronic address for service of submitter (i.e. email): mandys@cancersoc.org.nz

I would like my address for service to be my email *[select box if applicable]* **yes**

I have selected email as my address for service, and I would also like my postal address withheld from being publicly available *[select box if applicable]* **do not mind**

Scope of submission

The specific provisions of the proposed plan change that my submission relates to are:
[give details]

Design Guidelines and the need for built and natural shade. This is in regard to town centre planning, new subdivisions and new buildings – both residential and commercial.

Centres Design Guide

6.3 Amenity and Sustainability

Coordinating landscaping and water management early in the building and site design process can increase opportunities to more effectively integrate landscape treatment into outdoor open space, traffic circulation routes, service locations and the interface between the public and private domain.

76. Where possible, retain existing mature and healthy vegetation and integrate into the site development.

77. Choose plants that are appropriate to the climatic conditions, scale and character of the area; planting species that require low maintenance and attract local bird life is also encouraged.

78. Deciduous trees provide shade in summer and light in winter, but careful consideration should be given to species selection in heavily shaded areas to ensure survivability.

79. Incorporate compatible landscape architecture that complements the building design in terms of concept, form, and materials.

80. Integrate landscaping, screening, and physical barriers to lessen conflicts between pedestrians and motorists.

81. Maximise opportunities for sustainable plantings and permeable surfaces in footpaths, roofs, courtyards, and rear yards.

82. Use hedges or climbing plants where space is constrained and larger vegetation where sufficient space and access to rainwater is available.

83. Minimise the use of impermeable surfaces to manage and dispose of on-site stormwater. The use of permeable paving in locations such as parking spaces/areas is encouraged

Built and natural shade to be considered.

Residential Design Guide

Outdoor Living Space

25. Consider the need to provide for summer shade, through methods that integrate with the design of the space such as tree cover, eaves, verandas or balconies

30. Consider the need to provide for summer shade, through methods that integrate with the design of the space such as tree cover, eaves, verandas or balconies

65. Deciduous trees provide shade in summer and light in winter, but careful consideration should be given to species selection in heavily shaded areas to ensure survivability

76. Use of eaves is encouraged as they can help limit the duration of sunlight penetration in summer, preventing indoor spaces (particularly those with a northern aspect) from becoming too warm.

The Cancer Society supports these considerations for outdoor living spaces.

The Cancer Society support the rezoning of all areas listed to general residential zones. With built and natural shade an integral part of any new development or neighbourhood.

Continue on a separate sheet if necessary

Submission

My submission is: *[include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]*

The proposed Residential Design Guide and Town Centres Design Guide provide opportunities to enhance community wellbeing in the following ways: plan for the needs of cyclists and pedestrians in all new developments and provide additional recreation spaces in our communities. KCDC is also in a unique position to ensure that sun protection options are provided in all new housing developments and shared, outdoor public places, particularly with respect to shade, built and both planned and natural planted shade.

Sun protection and skin cancer prevention have both personal (behavioural) and environmental (shade) components. Concern is mounting both in Aotearoa New Zealand and internationally about the lack of environmental protection in public venues and facilities, including buildings.¹

There is increasing recognition that while in recent years much effort has gone into encouraging personal sun safety behaviour, environmental protection in the form of shade has been a relatively neglected component of sun protection initiatives.

This submission highlights the need for environmental protection from Ultra Violet Radiation. We recommend that requirements for shade provision be included in updated in all relevant KCDC guides and regulations for public spaces and housing of all types. The incorporation of shade provision into updated guides and regulations concerning public building must be considered in terms of its potential cost effectiveness. Skin cancer and melanoma have substantial health system and social costs. For instance, an independent economic analysis has shown that skin cancer ranks as one of New Zealand's most expensive cancers in terms of health system costs.²

We applaud Kapiti Coast District Council for acknowledging the necessity of shade provision in planning guides. Our population is growing rapidly, and this proposal to change the District Plan represents a significant opportunity to enhance the physical wellbeing of our community. Our feedback mainly focuses on built and natural shade provision as part of the Proposed Residential Design Guide (Appendix C) and Proposed Centres Design Guide (Appendix D). The Cancer Society Supports the specific provisions as listed below:

Continue on a separate sheet if necessary

I seek the following decision from the Kāpiti Coast District Council: *[give precise details]*

Appendix B. Proposed Residential Design Guide

INTEGRATE WITH PUBLIC REALM AND SURROUNDINGS » Improve connectivity to town centres and local public spaces by creating through-site walking and cycling links where possible » Respond to the surrounding environment and open-up developments to front public spaces and amenities » Consider the existing environment (built and natural) when designing to the anticipated level of residential intensification » Consider the potential for development on neighbouring sites » Provide for passive surveillance of the public domain through windows and building orientation » Create an environment that enables, supports and encourages sustainable transport behaviour

We support improved connectivity and the opportunity for our communities to use active transport. We support improved shade provision (both built and natural) in local public spaces and town centres to make the commute healthier (in terms of Ultra Violet Radiation protection) and more attractive. We support the provision of both built and natural shade at transport hubs so that passengers are not exposed to harmful UVR whilst waiting for public transport. Where possible, tree cover should be included as tree canopies can reduce the temperatures of the surfaces they shade by as much as 10 to 25 degrees.^{3,4}

The presence of trees encourages people to walk for both exercise and transport. This is associated with other health gains, including reduced incidence of heart attack and type 2 diabetes.⁵ There is also a growing body of evidence around green public spaces being supportive of mental health wellbeing.⁶

Considering the future implications of climate change it is of value to note that adequate tree planting (along with appropriate building design, materials and urban planning) can mitigate the heat island effect, thus future proofing current growth against future temperature rises. Planting more trees and using nature-based solutions for infrastructure can help to cool urban areas. Other benefits of tree planting include reducing greenhouse gas emissions, enhancing the mauri of land and water, enhancing biodiversity, and improving human health and wellbeing.⁷

CREATE A COMFORTABLE AND SAFE ENVIRONMENT » Provide accessible external and internal design that caters for people of all ages and abilities » Provide amenity through a balance of green, private and communal spaces » Orientate outdoor living spaces and buildings to maximise solar benefits

We support design that caters to the needs of all in our rohe. Access to shade is an equity issue.^{8,13} We respectfully request that increasing shade provision in our lower socio-economic status Kapiti neighbourhoods be made a priority. Tree canopy mapping, as occurs in other local government areas, would enable priority planting programmes.⁸

25. Consider the need to provide for summer shade, through methods that integrate with the design of the space such as tree cover, eaves, verandas or balconies.

We recommend the use of deciduous trees to ensure an adequate shade canopy in summer and lower temperatures around all buildings. For councils deciding on where to direct expenditure to improve a street, planting trees can give the best return. Trees can transform a street more easily than any other physical improvement.⁹

61. Where possible, existing mature and healthy vegetation should be retained and integrated into the site development.

62. Use planting to improve the outlook from dwellings and the street and to soften hard surface areas such as car parks, service areas or along internal site boundaries and driveways/shared accessways.

63. Use hedges or climbing plants where space is constrained and larger vegetation where sufficient space and access to rainwater is available.

64. Choose plants that are appropriate to the climatic conditions and character of the area; planting species that require low maintenance and attract local bird life is also encouraged.

65. Deciduous trees provide shade in summer and light in winter, but careful consideration should be given to species selection in heavily shaded areas to ensure survivability.

66. Use of hard landscape elements such as low walls, kerbs or raised beds is encouraged as these can provide protection to plants and, where integrated into the site design, can add to the visual amenity of outdoor spaces.

67. Minimise the use of impermeable surfaces to manage and dispose of on-site stormwater. The use of permeable paving in locations such as parking spaces/areas is encouraged.

We recommend all the above measures. We would like to see them stringently applied to the following areas:

Waikanae town centre

Paraparaumu town centre

We recommend the use of built and natural shade to reduce the urban heat island effect.^{10,11}

Any subdivisions or new developments:

The Cancer Society strongly advises that in any new subdivision the developer must be required to include adequate tree planting. We acknowledge there may be infrastructure issues for example, tree roots disturbing pavements or gas/water pipes. However, these can be mitigated with planning and Australian research suggests trees have economic benefits. They can lessen stormwater management costs by reducing the need to construct additional retention, detention and treatment capacity.¹²

As part of the consent process the developer should also be required to include and develop adequate green spaces in any new subdivision or extension of an existing subdivision. These green spaces should include natural shade and seating. They should not be limited to tiny pocket parks with a swing or see saw. Trees make a further environmental contribution in subdivisions by reducing runoff volumes and delaying the onset of peak flows from rainfall. In Australia, broadleaf evergreen trees provided an interception rate of up to 60 percent.⁹ Trees also create energy savings, plus aesthetic and air quality improvements.¹²

References

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Continue on a separate sheet if necessary

Hearing Submissions [select appropriate box]

I wish to be heard in support of my submission. **Yes, on behalf of the Cancer Society NZ (Wellington Division)**

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. **Yes, if appropriate**

If others make a similar submission, I will not consider presenting a joint case with them at a hearing.

A J Savage

15/9/2022

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

Date

A signature is not required if you make your submission by electronic means.

Trade Competition [select the appropriate wording]

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 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 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.**

Email your submission to
district.planning@kapiticoast.govt.nz

or post/deliver to:

Attn: District Planning Team
Kāpiti Coast District Council
175 Rimu Road
Paraparaumu 5032

For office use only

Submission No:
73



From: [Mandy Savage](#)
To: [Mailbox - District Planning](#)
Subject: Submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021
Date: Thursday, 15 September 2022 8:50:15 am

Mandy Savage has shared a OneDrive for Business file with you. To view it, click the link below.

15 September 2022 proposed-plan-change-2-submission-form-form-5 (1) final copy.docx

Kia ora

Please see attached my submission, on behalf of the Cancer Society's Kapiti Support Centre.

Please get in contact if you have any queries.

Ngaa mihi

logo



Mandy Savage

Kāpiti Centre Coordinator & Senior Health Promoter Kāpiti/Porirua | Pou Whirinaki & Toitū Te Whenua
MandyS@cancersoc.org.nz
tel/ 04 298 9676
mob/ 027 2601502

Cancer Society of New Zealand Wellington Division Inc.
52-62 Riddiford Street, Newtown, Wellington 6021
tel/ 04 389 8421
www.cancer.org.nz
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