

**UNDER** Schedule 1 of the Resource Management Act 1991  
(the Act)

**IN THE MATTER OF** Proposed Change 1 to the Regional Policy Statement  
for the Wellington Region

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**'Right of Reply' from Doctors for Active Safe Transport (DAST)**

**Hearing Stream 3, Transport**

**7 April 2024**

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## INTRODUCTION

1. Commissioners directed planning experts to caucus on the transport provisions of the proposed RPS Plan Change 1. Commissioners then invited further comments from submitters on the Joint Witness Statement (JWS) resulting from this caucus<sup>1</sup>. DAST responded to this invitation in its note of 30 September 2023.
2. The Reporting Officer commented on DAST's reply.<sup>2</sup> This reply introduced new arguments to which DAST considered further response was relevant.
3. The friend of submitters recommended this further comment be exercised by way of a "right of reply" – hence this note.

## BACKGROUND

4. The preamble to the transport provisions of the RPS notes that "Immediate, rapid, and large-scale reductions in greenhouse gas emissions are required to limit global warming to 1.5°C". Transport is the largest contributor to greenhouse gas emissions in the region and has continued to increase over the last 20 years, contrary to other major sources of CO<sub>2</sub><sup>3</sup>.
5. The RPS must therefore drive dramatic and rapid change in the way we do transport.
6. The original submission of DAST is that mode of transport is also a key determinant of health outcomes – in addition to climate impacts. These health impacts have not been recognised in the proposed RPS, despite health being central to the purpose in s(5) of the RMA.

## Officers Reply

7. The Reporting Officer's reply states "in my view it is not necessary to specifically reference health benefits or improved health outcomes in Policy CC.1".<sup>4</sup>
8. The reasons given for this view over both the initial Section 42A Hearing Report and Reporting Officer Right of Reply are:
  - a. It is "out of scope of the RMA".<sup>5</sup>

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<sup>1</sup> Minute 12 Point 19

<sup>2</sup> Reporting Officer Right of Reply, Hearing Stream 3, 19 October 2023

<sup>3</sup> Para 81, RPS Section 132 Report, August 2022

<sup>4</sup> Para 45.2, Reporting Officer Right of Reply, Hearing Stream 3, 19 October 2023

<sup>5</sup> Para 118, Section 42A Hearing Report, Hearing Stream 3, 31 July 2023

- b. It is unnecessary, as achieving mode shift for the purposes of reducing CO2 emissions would also “assist with health outcomes”<sup>6</sup> and “if people choose to walk or cycle as part of mode shift this is an improved health outcome”.<sup>7</sup>
- c. The “baseline health of the affected community or population would need to be identified before a change could be assessed” and would therefore “require health assessments as part of policy application”.<sup>8</sup>
- d. These health assessments which would be “costly and onerous”.<sup>9</sup>

#### **DAST Comment**

9. In response to each of these objections, we consider:

- a. Health is clearly within the scope of the RMA, as stated in the purpose of the Act in s(5). It is not “out of scope”.
- b. Identification of all the material harms and benefits of a proposal is critical to a balanced assessment of that proposal. Failing to assess health benefits, merely on the grounds that these are a ‘side effect’ of addressing climate impacts, will materially under-estimate the benefits of an active transport proposal, and under-estimate the costs of a project enabling motorised transport.
- c. A detailed understanding the baseline health of a population is not necessarily required to assess the incremental impact of a project. The evidence is clear (as stated in our original submission) that, in terms of active transport, ‘more is better’ regardless of the existing baseline.
- d. Regardless, given health is central to our resource management framework, consenting authorities have an existing obligation to understand the impacts on health of their planning decisions.
- e. Health assessments will add cost – although whether this is ‘onerous’ is a judgement that depends on the value placed on a community’s health. Applicants and consenting authorities are already required to incur the cost of numerous assessments – including of dust, noise, vibration, and odour. We assert that the impact of a project on the death rate from cancer, diabetes and health disease is at least as relevant as these other assessments.

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<sup>6</sup> Para 177, Section 42A Hearing Report, Hearing Stream 3, 31 July 2023

<sup>7</sup> Para 38, Reporting Officer Right of Reply of Louise Ruth Allwood, Hearing Strem 3, 19 October 2023

<sup>8</sup> Para 39, Reporting Officer Right of Reply of Louise Ruth Allwood, Hearing Strem 3, 19 October 2023

<sup>9</sup> Para 39, Reporting Officer Right of Reply of Louise Ruth Allwood, Hearing Strem 3, 19 October 2023