

Tasman District Council

Draft Tasman Environment Plan – Initial Consultation

11 December 2020

For more information please contact:
Jane Murray
NMDHB Public Health Service
Email: jane.murray@nmdhb.govt.nz
Phone: (03) 543 7805

Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Tasman District Council's Tasman Environment Plan Consultation
2. NMH makes this submission in recognition of:
 - a. its functions and responsibilities in funding and providing health services to the public, such as the Nelson Hospital and community support services (e.g. for disabilities, mental health), under the Health and Disabilities Services (Safety) Act 2001
 - b. its 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
 - c. 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.
3. NMH also makes this submission from a Health in All Policies (HiAP) perspective. HiAP is defined as "an approach to public policies across sectors that systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts, in order to improve population health and health equity." It emphasises that local and national government objectives are best achieved when all sectors include health and wellbeing as a key component of policy development. For example, good health enhances quality of life, improves workforce productivity, increases the capacity for learning, strengthens families and communities, supports sustainable habitats and environments, and contributes to security, poverty reduction and social inclusion.
4. NMH considers that HiAP recognises the parallels between the roles of the public health and local government sectors in contributing towards the shared goal of promoting and protecting community wellbeing. For example, HiAP assists Tasman District Council's (TDC) role under the Resource Management Act 1991 (RMA) of sustainably managing natural and physical resources in way that "enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety" and ensuring that any adverse

effects of activities on the environment (including effects on people and communities) are avoided, remedied or mitigated. It also underpins NMH's role in improving, promoting and protecting the health of people and communities as identified above.

5. To elaborate further, health starts – long before we see a doctor – in our families and homes, in our schools and workplaces, in our playgrounds and parks, and in the air we breathe and water we drink. Therefore, in order to maintain or improve community health and wellbeing attention must be focused on the social, cultural, economic and environmental factors that protect and promote good health. These factors are known as the determinants of health and more often than not have a greater bearing on the health of communities and individuals than access or use of healthcare services.
6. Local authority plans prepared under the RMA have a significant influence on shaping the environments that we live in and accordingly affect the determinants of health. Examples where the provisions of plans can have an influence on public health and wellbeing outcomes include urban design (e.g. subdivision and housing requirements, transport, opportunities for physical activity) and the sustainable management of life supporting resources (e.g. soil, air and water quality).

Specific Comments

Climate Change

7. NMH is pleased to see that TDC will be taking the opportunity to strengthen its commitment to managing the effects of climate change through both reducing emissions and adaption. NMH would like to see the Tasman Environment Plan (the Plan) include provisions that:
 - a. would promote renewable energy,
 - b. require infrastructure to support active transport and protect vulnerable communities,
 - c. enable environmental enhancement and restoration
 - d. require sustainable and resilient urban design.
8. NMH would like to see the Chapter on Climate Change
 - a. recognise the need for flexibility to enable the Council and the community to adapt to changes over time as a result of climate change.

- b. recognise the potential effects on the Nelson community's physical and mental health and wellbeing. WHO has identified the overall health effects of a changing climate as overwhelmingly negative¹. Extreme high air temperatures contribute directly to deaths from cardiovascular and respiratory disease, particularly among elderly people. The National Climate Change Risk Assessment for New Zealand details risks to mental health, identity, autonomy and sense of belonging and wellbeing from trauma due to ongoing sea-level rise, extreme weather events and drought. Pollen and other aeroallergen levels are also higher in extreme heat. These can trigger asthma, 10.5% of the Nelson Marlborough population already has asthma²
9. NMH, TDC and other key agencies need to work together to look at the local health effects of climate change on the region. NMH is happy to partner with TDC on this work.
10. NMH strongly supports TDC assessing and addressing the carbon footprint of its own activities and encouraging other businesses to do likewise. In giving effect to this, NMH recommends that TDC records and reports on its carbon emissions and encourages other local businesses and organisations to do the same. Current council activities which go towards lowering carbon emissions, such as introducing carpooling and TDC's role in planting trees, should also be recognised.

Air Quality

11. NMH would support measures to improve air quality in the District. NMH recommends that the District Plan rules are strengthened to meet the updated National Air Quality Standard.
12. NMH notes that the Draft National Air Quality Standard only restricts domestic, solid fuel burners newly installed on properties that are less than two hectares in size in rural areas. NMH disagreed with this in its submission on the Standards and recommends that the new domestic burners apply to all properties regardless of property size. This is a simpler standard to apply rather than a blanket rule that seeks to create an urban-rural split.
13. NMH is pleased to see that TDC has initiated an ongoing monitoring programme to evaluate air quality and notes that rural burning does contribute to poorer air

¹ [https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health#:~:text=Climate%20change%20affects%20the%20social,malaria%2C%20diarrhoea%20and%20heat%20str](https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health#:~:text=Climate%20change%20affects%20the%20social,malaria%2C%20diarrhoea%20and%20heat%20stress.)

² <https://www.nmdhb.govt.nz/dmsdocument/199-nmh-health-needs-assessment-2015> pg 51

quality on an intermittent basis. NMH recommends that alternatives to burning vegetation on rural properties are reviewed.

Contaminated Land

14. NMH recommends that TDC uses the National Environment Standard for Assessment and Managing Contaminants in Soil to Protect Human Health as the primary management method for contaminated land.

Natural Hazards

15. NMH is pleased to see TDC's ongoing commitment to further identify hazards in the region. NMH would like to see included in the Plan the implementation of a strategic framework and action plan to address risks associated with natural hazards and to adapt to the effects of climate change.
16. NMH would like to TDC look at Nelson City Council's model for a non-regulatory programme funding for the likes of Nelson Nature and Climate Forum to assist with biodiversity, and assist communities to adapt to potential climate change impacts.

Hazardous Substances

17. NMH recommends that TDC uses the Hazardous Substances and New Organisms Act as the base document to manage Hazardous Substances.

Freshwater

18. Water is essential and NMH would like to see the values of Te Mana o te Wai clearly articulated within the Freshwater chapter so that there is a focus on the holistic health and wellbeing of waterbodies. NMH notes the TDC commitment to "*Tūpuna Pono, Being Good Ancestors*", the Te Taihū Intergenerational Strategy. This strategy has an action on improving water stewardship. Freshwater values need to be protected from inappropriate use and development and those water bodies that have degraded water quality need to be restored. In addition NMH supports integrated management of surface and groundwater resources. NMH supports objectives and policies that promote land management that minimises nutrient loss, and does not accelerate soil erosion. NMH also supports the management of flood hazards within the natural character of the waterways.
19. Riparian values: NMH would like to see policies that maintain and enhance the values of riparian margins by
 - a. Preventing livestock damage
 - b. Managing the adverse effects of earthworks, land disturbance and vegetation clearance

- c. Encouraging the planting and restoration of riparian margins to reduce flows of sediment and contaminants

20. *Primary contact water quality standards*: NMH would support standards and timeframes for improving water quality in surface water bodies used for primary contact that Nelson City Council have adopted, especially for Band A/B where water quality needs to be maintained or improved; Band C water is improved to Band B standards by 2030; Band D water is improved to Band C was by 2030 and then to Band B standards by 2040.
21. *Protection of community water supply sources*: TDC should be aware that the new *Water Services Bill* when enacted this likely to include catchment risk management plans and the Water Safety Planning Framework 2018 places a strong emphasis on drinking water source protection therefore we would like this recognised within the revised Chapter.
22. *Freshwater allocation limits*: NMH is in support of adding allocation limits, but any provisions must give priority to water associated with the public health needs of the community.
23. *Rainwater Collection*: NMH notes the importance of rainwater collection as the population grows and there are more frequent droughts as a result of climate change. NMH supports the use of rainwater for gardening, cleaning or toilet/laundry purposes. NMH does not support the use of rainwater for drinking water purposes unless there are no alternative reticulated option and only where suitable treatment is in place to render the water potable. NMH would like to see explicit direction in the Plan of when rainwater collection can be used.
24. *Discharges of untreated wastewater*: NMH would like this policy in relation to untreated wastewater to reflect that discharge would only occur in an unavoidable emergency situation such as a significant infrastructure failure.
25. *Community Water Supply Network*: NMH would like to see a policy that prevents the abstraction from surface water and groundwater sources where alternative supply is available from a community water supply network. TDC needs to take particular cognisance of the changing drinking water regulatory regime and ensure that supply upgrades, especially treatment, proceed at the earliest opportunity. TDC should continue to consider introducing residual disinfection on its non-chlorinated supplies, again in anticipation of likely legislated requirements.
26. *Water Conservation*: NMH would like to see policies that require all users of surface water and groundwater to implement water demand and water

conservation strategies to ensure water is used efficiently and minimises demand on freshwater.

27. *Groundwater resources*: NMH would like to see a policy that avoids saltwater intrusion or adverse effects into any at-risk groundwater

Marine Water Standards

28. NMH recommends that these Standards align with the current (or subsequent editions) Ministry for the Environment's "Microbial Water Quality Guidelines for Marine and Freshwater".

Noise

29. NMH recommends that the Noise section of the Plan uses a district wide table of noise limits. The structure for district-wide noise limits in Table 5 of NOISE-REQ1 in the proposed Selwyn District Plan is considered to represent good practice and it is recommended that this should be adopted in the Nelson Plan.

<https://eplan.selwyn.govt.nz/review/#Rules/0/283/1/0/0>

Urban form and development

30. NMH would like to see objectives within this Chapter relating to requirements for compact urban forms. There are many perceived benefits of the compact urban forms, which include: less car dependency thus lower emissions, reduced energy consumption, better public transport services, increased overall accessibility, the re-use of infrastructure and previously developed land, a regeneration of existing urban areas and urban vitality, a higher quality of life and the preservation of green space.
31. NMH understands that it is important that Tasman needs to have sufficient adequate housing supply and supports this. NMH would like to see the Plan have requirements for the supply of land, a range of housing types, universal design standards or energy efficiency. Much of New Zealand's existing housing stock is typically three-bedroom standalone housing on large properties. Our changing demographic structure means that there will be greater demand for smaller single level houses in locations with good access to services and amenities. There is a need to ensure that houses can cater for a broad range of abilities, that is why universal design is critically important so if home occupiers injure themselves or as they age, then they can continue to use their homes without expensive modifications. In addition to this it is important these homes are as warm, dry and energy efficient as possible so people can stay healthy in their homes as well as reduce their environmental impact. These three elements need to form part of the Housing Bottom Lines in the Plan.

32. Overall NMH would supports the Plan to enable intensification around town and suburban centres and have good accessibility by public and active transport. NMH notes that the Richmond Housing Choice Plan Change also caters for this. NMH the Plan be more explicit about ensuring that new growth is designed in a manner that provides housing that enables people to age in place.

33. NMH would like to see requirements to have trees added to grass berms as this would have aesthetic, mental health and environmental benefits.

Subdivision

34. NMH would like to see policies within this Chapter include requirements that subdivision have attractive, healthy residential neighbourhoods that have safe speed environments, connections into reticulated water supply and waste water, well connected transport network, public open space network.

35. NMH would like to see requirements for new buildings in subdivisions to have low impact stormwater design, water and energy efficient low carbon buildings

Residential Zones

36. NMH would supports objectives for the Residential zone to include good levels of residential amenity, offering a range of housing types and forms, provision for safe attractive street environment. In addition, NMH would like to see provisions that allow people to age in place such as universally designed homes. This will continue to be important as our population ages. NMH recommends that that environmental standards are encouraged and incentivised so that that greenhouse gas emissions as part of the building process are lowered.

Medium Density

37. NMH recommends that to incentivise the provision of medium density housing that has universal design guidelines, consideration could be given to adjusting minimum net area if a higher proportion of units meet universal design guidelines. In addition, NMH would like to mechanisms added to the Controlled and Discretionary Activities stating that a proportion of the units must meet universal design guidelines. Older people have more sensory and physical limitations than younger people. Housing that does not meet their needs exacerbates existing health conditions and heightens the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily

high level of care and support, and shifts the cost of what is primarily a housing problem onto the health and social services sectors.³

38. Universal design ensures a home is sustainable and can be adapted to meet the life-time needs of the resident from the stage where they have young children in pushchairs to when they are elderly and/or have a disability. Specifically, it 'describes the concept of designing housing features to be aesthetic and usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life'. NMH believes that consideration should be given to requiring the incorporation of universal design standards within a certain proportion of multi-unit developments. The following standards are used by Banyule City Council in Melbourne, Australia⁴:

- a. 3-9 dwellings = minimum of one dwelling incorporate Liveable Housing Design Guidelines
- b. 10+ dwellings = minimum 20% of dwellings incorporate Liveable Housing Design Guidelines

NMH recommends that NCC adopts this approach in order to adapt housing to meet the needs of an ageing population.

39. NMH understands that the parking requirements have been removed as a requirement from the National Policy Statement on Urban Design Standards. NMH would like to see requirements to be added for cycle parking for sites which have four or more residential units. The addition of cycle parking would encourage people to cycle. This supports the strategic priorities in the Government's Position Statement to offer Better Travel Options. This also has positive health benefits. NMH recommends that the Development Manual is updated to include minimum cycle parking requirements

Open Space and Recreation zones

40. NMH would like to see the objectives of this Chapter reflecting the need to provide facilities that meet the health and wellbeing needs of the community; that are accessible and distributed widely across the community and contribute to a high-quality urban environment.

³ Saville-Smith K, Saville J. 2012. *Getting accessible housing: Practical approaches to encourage industry take-up and meeting need*. Centre for Research, Evaluation and Social Assessment for the Office for Disability Issues and the Ministry of Business, Innovation and Employment.

⁴ <https://www.banyule.vic.gov.au/files/assets/public/operating-images-amp-docs/documents/liveable-housing-design-guidelines.pdf>

41. NMH would like to see recognition that the inherent qualities of natural areas and water bodies within open spaces are protected, maintained and enhanced.

Transport

42. NMH would like to see objectives in the Transport chapter that require to coordinating both community services and transport connections. This will enables people to easily navigate their community to access their daily needs. This is important especially for our ageing population who need to easily access services so that they can stay independent.
43. NMH would also like to see objectives requiring a modal shift in transport because this offers people a range of transport choices including walking and cycling which has physical and mental health benefits. Active forms of transport, such as walking and cycling, have a range of environmental benefits, including producing no air pollution, noise pollution or greenhouse gases.
44. Walking or cycling for transport helps integrate physical activity into everyday life. The health benefits of active transport include increased physical activity, improved mental health and reduced risk of diseases, such as cardiovascular diseases and cancer.
45. NMH would like to see that priority is given to walking and cycling modes on local roads. In the development of intersections in new subdivisions, cars would need to give way to active modes who are travelling straight. This design appears to be working successfully in Stoke near the Railway Reserve and aligns with Waka Kotahi proposal (March 2020) to give priority to straight travelling modes rather than turning traffic.
46. NMH would like to see this approach being used on local roads (according to the road hierarchy) across Nelson and would like the Land Development Manual updated to facilitate this.
47. NMH would like to see requirements for minimum cycle parking requirements including end of ride facilities across the zones to enable mode change. NMH recommends that the following requirements are add: Add minimum cycle parking standards to the Plan which include the following requirements:
- a. Stands shall be securely anchored to an immovable object.
 - b. Stands shall support the bicycle frame and front wheel.
 - c. Stands shall allow the bicycle frame to be secured.
 - d. Cycle parking facilities shall be clearly signposted or visible to cyclists entering the site.

- e. Cycle parking facilities shall be located so as not to impede pedestrian thoroughfares including areas used by people whose mobility or vision is restricted.
- f. Cycle parking facilities shall be located so that the bicycle is at no risk of damage from vehicle movements within the site.
- g. Cycle parking facilities shall be located as close as possible to and no more than 30 metres from at least one main pedestrian public entrance to the building/activity.
- h. Cycle parking facilities shall be available during the hours of operation and shall not be diminished by the subsequent erection of any structure, storage of goods, or any other use.
- i. Staff/ residents/ tertiary students' cycle parking facilities shall be located in:
 - i. a covered area; and
 - ii. a secure area, unless located in an area where access by the general public is generally excluded.

48. NMH would support provisions that reduce conflict points between vehicles and pedestrians and cyclists as this will reduce the number and severity of accidents. It would be of value to have standards and terms for cyclist access. Access for cyclists may be different than that for pedestrians and motorists. Therefore in order support cycling, it is important that there is appropriate infrastructure in place to ensure that cyclists can have safe journeys.

Energy and infrastructure

49. NMH would support policies that maintain and upgrade regionally significant infrastructure so that is resilient to the effects of climate change. In addition, NMH supports the policy which avoids, remedies or mitigates the adverse effects on the environment of regionally significant infrastructure.

50. NMH recommends that there are policies and mechanisms that encourage and enable the development of renewable energy and improved efficiency in the use of energy, in particular the encouraging effective insulation of residential dwellings, ultralow emission burning wood burners and facilities for charging electric vehicles.

Signs

51. NMH operates large facilities with many departments / services operating out of the same site and accessed off the same entrances. Adequate signage is required

in order to appropriately direct patients, their family and staff. Therefore NMH recommends that there are no restrictions on the size and number of signs on health sites provided that the signs relate solely to health.

52. NMH would like to see additional rules added to the Sign chapter to control the use of alcohol marketing signs. Evidence has shown that exposure to commercial communications of alcohol is associated with the likelihood that adolescents will start to drink⁵. Becoming intoxicated at a young age is a strong predictor of having problems with alcohol as an adult.⁶
53. The misuse of alcohol by young people has been associated with increased risks of a number of adverse outcomes including: motor vehicle collisions, injuries and deaths; crime; violence; sexual risk taking; mental health problems and victimisation⁷.
54. There is consistent evidence to suggest that a substantial fraction of New Zealand young people engage in heavy drinking including hazardous drinking, alcohol abuse and alcohol dependence. Over a third of young people engage in binge drinking or hazardous drinking and by the age of 25 over 20% will have developed a significant alcohol related problem.
55. As there is a linkage between exposure to alcohol advertising and harm to adolescence and children, NMH would like to see limitations put on the placement of Alcohol signage near educational facilities so that young people are protected. The same limitations on the placement of alcohol advertisements should also apply to other sensitive sites such as community or health facilities to protect those who may be seeking alcohol or addiction services. NMH recommends that there is a rule added stating that "do not advertise or market alcoholic products within 100 metres of health, educational or community facilities"
56. Auckland Council is currently looking to restrict off-licence signage on public land.

Health services

57. NMH would like to see requirements in relation to Health services in non-commercial zones to be able to have a gross floor area occupied of 500m².

⁵ Alcohol Healthwatch (2019) An exploratory audit of off-licence compliance with the Auckland Council Signage Bylaw, Otara-Papatoetoe

⁶ Newton-Howes et al (2009) *Comparison of age of first drink and age of first intoxication as predictors of substance use and mental health problems in adulthood. Drug and Alcohol Dependence Vol 194 238-243*

⁷ <https://www.otago.ac.nz/christchurch/otago018747.pdf>

Conclusion

58.NMH thanks the Tasman District Council for the opportunity to comment on the Tasman Environment Plan Consultation.

59.NMH looks forward to working in partnership with TDC on public health and wellbeing issues that arise in relation to the Tasman Environment Plan.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Peter Bramley', with a long horizontal flourish extending to the right.

Peter Bramley
Chief Executive
peter.bramley@nmhs.govt.nz