

**Marlborough District
Council**

**Feedback on the Victoria
Domain Reserves
Management Plan**

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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 Marlborough Council's request for feedback for the Victoria Reserves Management Plan review.
2. NMH makes this submission in recognition of its 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.
3. This submission sets out particular matters of interest and concern to NMH.

Specific Comments

4. NMH strongly supports the holistic values of the draft Victoria Reserves Management Plan ("the Plan") especially in regards to:
 - a. Kaitiakitanga to ensure an outcome of ao hauora iwi hauora
 - b. Ngā Tākaro Pūangi (Recreation): a safe, suitable place for people of all ages and abilities to enjoy recreational activities; and easily accessible; extensive and varied walking and biking tracks.
 - c. Te Taiao (The Natural World): native vegetation regenerating well; natural environment for all to enjoy.
5. The Victoria Domain Reserves are a key recreational area for residents and visitors to Picton. Recreational green space areas can influence health and wellbeing by providing opportunities for people to undertake physical activity, by facilitating the development of social capital and through restorative effects on mental health¹. The values and strategic direction clearly articulate the importance of recreational use as well as the importance of enhancing natural, cultural and historical values.
6. NMH supports the objectives and policies within the Kaitiakitanga section regarding maintaining and enhancing the mauri of the Reserves and enabling Tangata Whenua Iwi to carry out cultural harvest because these policies will enhance local community's health and wellbeing.

¹ [https://mindfulnesseducation.nz/wp-content/uploads/2017/11/Blaschke PHC Presentation GreenBlueSpace 2014.pdf](https://mindfulnesseducation.nz/wp-content/uploads/2017/11/Blaschke_PHC_Presentation_GreenBlueSpace_2014.pdf)

7. NMH supports all the policies and objectives in relation to Ngā Tākaro Pūangi (Recreation). NMH notes that very specific standards and guidelines are included in the Plan however given that the previous plan was in place for over 20 years, and standards and guidelines alter over time, it may be prudent not to be prescriptive to ensure that the Plan does not date.
8. NMH is pleased to see that there is a specific policy (3.14) to minimise conflicts between pedestrian users and mountain bike riders to improve safety and enhance user enjoyment. This will help to reduce the number of accidents between users.
9. In regards to User facilities (6.2.2), there is no mention that that facilities and infrastructure meet universal design standards so that they are accessible to all. NMH recommends that a new clause is added to 6.2.2: *Ensure facilities and infrastructure (e) meets universal design standards*
10. NMH supports the Signage objectives and policies in relation to establishing and maintain clear signage.
11. NMH notes that in the background information document, *Fire* was listed as an issue, and that 12 months ago, upper tracks in the Reserve were closed due to extreme fire risk. The Picton Fire Brigade stated that "*there are challenging issues when dealing with fire callouts on the Reserves including the availability of water and access²*". NMH recommends that MDC consider making the Victoria Domain Reserves smokefree. Cigarette butts account for 78% of all littered items in New Zealand³. Smokefree areas will help to reduce the number of cigarette butts discarded. As a result of climate change, the number of severe fire weather days in Marlborough will increase, therefore restrictions in outdoor smoking areas could contribute to a reduction in fire risk in the district.
12. Cigarette butts are toxic to the environment. They are easily carried in stormwater runoff through drainage systems and eventually to local streams, rivers, and waterways. It can take up to 25 years for cigarette butts to biodegrade, when they do so the butts can release toxins into the soil or water that surrounds them. The non-biodegradability of cigarette butts results in

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https://www.marlborough.govt.nz/repository/libraries/id:1w1mps0ir17q9sgxanf9/hierarchy/Documents/Recreation/Parks%20and%20Open%20Spaces%20-%20Plans%20Reports/Victoria_Domain_Reserves_Management_Plan_Background_Information.pdf Pg. 6

³ <https://www.knzb.org.nz/wp-content/uploads/2018/04/KNZB-Litter-behaviour-report-DRAFT-0.3-Released-3.4.18.pdf>

additional costs to council waste disposal programs.⁴ Smokefree areas would help protect the environment and ensure Victoria Reserves remain attractive and clean. NMH recommends that smoking and vaping is added to the prohibited activities list in 6.81. in order to protect the environment and also protect people from second-hand smoke. Second-hand smoke is a human carcinogen for which there is no safe level of exposure.⁵ In addition, NMH recommends that the level of signage in relation to smokefree messaging is reviewed across all the Reserves. NMH are happy to work with MDC to assess the number and location of signage across the Reserves, as well as provide resourcing for additional signage where needed.

13. NMH notes that the Plan has no mention of lighting or shading requirements, drinking water access, and rules on alcohol consumption. It would be beneficial for the Plan to include expectations on these matters to provide direction.

Conclusion

14. NMH thanks the Marlborough District Council for the opportunity to feedback on the Victoria Reserves Management Plan review.

Yours sincerely



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⁴ Novotny, T.E, Lum, K., Smith E. (2009) *Cigarettes Butts and the Case for an Environmental Policy on Hazardous Cigarette Waste* *International Journal of. Environmental Research and Public Health* **2009**, 6(5), 1691-1705; <https://doi.org/10.3390/ijerph6051691>

⁵ <https://www.ehinz.ac.nz/assets/Reports/Burden-of-disease-due-to-second-hand-smoke-for-publication-Final-2016-06-28.pdf>