



Ref: [REDACTED]

Civic House, 110 Trafalgar Street
PO Box 645, Nelson 7040, New Zealand

6 September 2024

P (03) 546 0200
E LGOIMA@ncc.govt.nz
nelson.govt.nz

[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]

OFFICIAL INFORMATION REQUEST FOR HEALTH NEW ZEALAND SUBMISSIONS

I refer to your official information request dated 22 August 2024:

A copy of "all submissions within the last 12 months from Health New Zealand in respect of any Council long-term plan or annual plan or regional transport plan or bi-law [sic] consultation processes".

The information you requested is enclosed.

Health New Zealand (also known as Te Whatu Ora) submitted to Council's Long Term Plan and associated policies in April 2024, and on Council's Urban Environment Bylaw in July 2024. While these are all available on Council's website, we have attached the specific submissions relevant to this response in this instance.

Some redactions have been made under section 7(2)(a) of the Local Government Official Information and Meetings Act 1987 – note that for these types of consultations Council typically makes the submitter's name public, but not contact details. As the names associated with these submissions are already in the public arena it is only contact details that have been removed.

You have the right to seek an investigation and review by the Ombudsman of this response. Information about how to make a complaint is available at www.ombudsman.parliament.nz or Freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact LGOIMA@ncc.govt.nz.

Yours sincerely

Devorah Nícuarta-Smith
Manager Governance and Support Services

Encl: Health New Zealand submissions – combined

Internal Document ID: [REDACTED]

Long Term Plan 2024-2034

Submitter Details

Submission Date: 24/04/2024

First name: Hana **Last name:** Wilkinson

Organisation: National Public Health Service

Postal address:

Suburb:

City:

Country: NZ

Postcode:

Email: LGOIMA s7(2)(a)

Daytime Phone: LGOIMA s7(2)(a)

Would you like to present your submission in person at a hearing?

If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please include this information in your submission.

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

LTP Hearing Day 1 - Thursday, 9 May 2024 Council Chamber, Nelson City Council Civic House **LTP Hearing Day 2** - Friday, 10 May

2024 Council Chamber, Nelson City Council Civic House

Additional requirements for hearing:

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

Feedback

Key Issue 1: Rates affordability – Which option do you support? (please tick one)

Option one – Fewer service cuts and higher rates increases

Comments (Optional)

Maintaining essential infrastructure that supports urban intensification, climate action and environmental projects, community organisations and facilities is essential to the health and wellbeing of current and future generations.

Whilst we recognise the need for the proposed rates increase to fund services and projects that promote the four wellbeing's, we acknowledge that rate increases will inequitably impact disadvantaged populations, particularly older people on fixed incomes and single or low-income families. As highlighted in He piki tūrangā, he piki kotuku – The future for Local Government report, the overall model of funding local government functions and services is unsustainable, and rates cannot continue to rise indefinitely. We support the development of stronger funding and commissioning relationships between central and local government. The risk to public health of future generations from deteriorating assets, outweighs the benefits of rates remaining unchanged. However, given the current cost of living issues, it is important that rate assessments include the potential to exacerbate existing inequities amongst rate payers.

NPHS noted a reduced budget for cycle lane line markings. Cycle markings are important as they increase the perception of safety for users. This type of investment into better active transport and micromobility environments delivers a range of social, environmental and economic benefits which include reduced congestion, emissions, and increased health and wellbeing. Investment in walking and cycling infrastructure can save costs long term by freeing up road and parking space and reduce costs for additional road capacity, maintenance and transport infrastructure for motor vehicles.⁵ In addition, cycling saves people money to spend in their local communities. Evidence suggests those who cycle are more likely to stop in and spend money at shops. 5 Cycle lanes in Nelson urban retail areas would support the retail and hospitality industry and help to revitalise Nelson city centre. Recommendation: council invest into maintaining cycle lane markings.

There are concerns relating to the potential of the reduction in air quality reporting, and the ability of the public to react or respond to exceedances in real time. Recommend council retain regular reporting of air quality.

It is important to note that whilst this LTP suggests a reduced investment in maintenance costs for Parks and Reserves, it also suggests significant investment into new community facilities such as playgrounds. The wellbeing benefits of both these amenities are high. Therefore, it is essential that investment is balanced in a way that means existing facilities can be upgraded to meet their potential and that any new facilities built are able to be fit for purpose and maintained to a high level.

Key Issue 3: Council's forestry approach – Which option do you support? (please tick one)

Option two – Change our approach and exit commercial forestry over time and grow a continuous canopy of mixed species (Council's proposal)

Comments (Optional)

NPHS Te Waipounamu supports the exit of commercial forestry as it provides for a holistic approach to the management of NCC's native and exotic forests. This option proposes to develop a long-term asset for the community with improved environmental, recreational and social outcomes. Trees are good for our natural environment as they absorb carbon from the atmosphere, support flood mitigation and encourage biodiversity

Key Issue 5: Housing Reserve Fund changes – Which option do you support? (please tick one)

Option one – Retain our current approach and continue to work with and support partners who have the ability to deliver social and affordable housing solutions for the community

Comments (Optional)

NPHS Te Waipounamu recommends retention of the current approach to support the delivery of social and affordable housing, where applications are open to iwi trusts and those who are registered as not-for-profit Community Housing Providers by the Community Housing Regulatory Authority.

NPHS Te Waipounamu recommends that all new builds are designed for sustainability and community resilience (such as Green Star and Green Star Communities) and support accessibility implementing universal design principles⁸. Housing development should be closely tied with active and public transport infrastructure.

Recommend: a separate line item is created to provide additional funding to support and work with partners to develop and provide accommodation for vulnerable and high need residents.

Key Issue 6: All-weather sports turf – Which option do you support? (please tick one)

None of the above

Comments (Optional)

It is not clear what drainage solutions have already been tried, where the location of the turf would be and who would benefit from the turf.

It is unclear whether there has been significant enough investment into improving drainage at existing fields to enable

increased usage in wetter conditions. If improving drainage worked, it would provide a solution that has co-benefits for the environment, sporting community and rate payers. We are in support of enabling more entry level players to participate in sport when they may otherwise not be able to due to, such as with wet grounds. People active in sports have, in general, better health than those who do not participate in sports, because they are physically and mentally prepared for the challenges of sports, abilities that in many cases can be transferred to other parts of life. However, we know that if we don't take important steps to mitigate climate change, such as reducing emissions and microplastics, the health of future generations will be worse off. Could a more nature-based solution be taken to improve drainage for example planting of trees and plants to support water absorption.

Recommend providing more information for public consultation.

Key Issue 7: Tāhunanui Beach facilities – Which option do you support? (please tick one)

Option two – Construct a new facility for the Nelson Surf Life Saving Club and upgrade the changing facilities (Council's proposal)

Comments (Optional)

NPHS Te Waipounamu supports the development of Tāhunanui Beach facilities. This includes the provision of a new, fit for purpose building for the Surf Lifesaving Club close to the beach. However, it is important that sea level rise and the impact on the marine and foreshore environment is considered. Supporting this development may encourage the growth and retention of volunteer surf lifesavers, creating a safer environment at the beach. It was noted that Council's independent report identified "that there is a deficit in meeting levels of service for sports facilities at the Tāhunanui Beach. The most urgent relating to the Surf Lifesaving Club's facilities, the safety of their members, and the ability to respond to emergencies. Changing facilities for the sports fields (especially women, girls, accessible and non-gendered provision), storage facilities, and the lack of a sports hub (social/meeting rooms) contribute to the case."

Recommend the implementation of universal design standards in all facilities and the inclusion of gender-neutral toilets, supporting recreation opportunities for all ages and abilities.

Recommend considering sea level rise and environmental impact.

Key Issue 8: Arts Hub – Which option do you support? (please tick one)

Option two – Purchase an existing building and establish an arts hub (Council's proposal)

Comments (Optional)

NPHS Te Waipounamu supports the purchase of an existing building and establishment of an arts hub. There is a growing body of evidence showing how arts and creativity can make a significant difference to people's health and wellbeing.¹⁰ NPHS strongly recommends that equity and inclusiveness is considered in all aspects of the facility, including all ages, demographics and physical abilities.

Recommend the following is implemented in the development of an arts hub:

- Universal design standards
- Arts programmes that support culture (including Māori, Pacifica, former refugee) and diversity.

Any other comments on the Long Term Plan 2024-2034 Consultation Document (Optional)

Civic Investment

NPHS Te Waipounamu supports the review of options for Civic House and the Elma Turner Library. NPHS Te Waipounamu understands that there will be considerable consultation on the topic in future (including the next LTP in 3 years' time) as options get formalised.

In the 2021- 2031 LTP a Library Precinct Redevelopment was proposed to be built to Green Star 5 ratings and

be built as a climate change-resilient building. NPHS Te Waipounamu recommends that these standards continue to be in the forefront of all plans going forward. Sea level rise will also need to be factored in as previously commented on, with consideration of NCC's Coastal Inundation maps.

In 2022, we engaged with NCC on the project exploring the development of a new library/hub. We provided written feedback to NCC in August 2022. This feedback was developed from conversations with staff across the health system and included health and wellbeing considerations. We recommend the detail of this feedback is considered early on in this project. We are happy to provide the feedback again on request.

Bridge to Better

NPHS Te Waipounamu supports in principle, pending review of the concept design proposed to be consulted on in May 2024.

NPHS Te Waipounamu supports the water infrastructure upgrade that will provide capacity and resilience to cater for hundreds of homes in the city centre. Well-designed inner-city living can provide compact, connected, integrated, resilient and inclusive homes. When done well, these homes can have positive impacts on health, through social connection and cohesion, civic participation, air quality and promoting physical activity.

Sufficient green and recreational space will need to be considered for Inner city living environments and we support the implementation of the Urban Greening Plan 2022. NPHS Te Waipounamu notes the importance of greenspace and trees in the context of climate change, particularly to reduce potential heat-related illness and mortality from rising temperature and in a heatwave event.¹¹ Urban communities are at risk of the urban heat island effect as many of the materials used in urban settings – brick, concrete and steel – trap heat and increase the overall temperature experienced in urban environments.

NPHS Te Waipounamu recommends that outdoor dining environments support a safe, healthy and cohesive environment and are:

- Alcohol, smokefree and vape-free and free from associated advertising.
- Accessible, encompassing universal design standards
- Pedestrian and cycle friendly.
- Conversant with Crime Prevention Through Environmental Design.

Recreational Access to Ngāti Koata whenua

NPHS Te Waipounamu supports the negotiation of a long-term recreational access agreement over Ngāti Koata whenua (land) providing important walking, running and mountain biking opportunities for residents and visitors to Nelson. It is understood this agreement would not involve purchasing any land at this time.

Where appropriate (and in discussion with Ngāti Koata), kaupapa Māori signage could be installed to promote a bilingual signage environment. Signage has the potential to support the revitalisation of Te Reo Māori, provide information on the whakapapa of the whenua and contribute to decolonising, all which is required to achieve Pae Ora (health futures equity for all). It is essential that NCC works with mana whenua to identify these opportunities.

Extend East West cycle way link

NPHS Te Waipounamu fully supports the creation of an active travel link from the Maitai/Brook areas in the east to the Railway Reserve corridor in the west. This project would improve the cycle connections across the city and address safety for cyclists using the route. It is pleasing to see the route encompasses five schools and NMIT. Funding for more cycle connections should be prioritised, particularly with the funding for a shared pathway along Rocks Road removed from the draft Government Policy Statement on Land Transport. Active transport increases levels of activity and have multiple positive health outcomes, including mental health and wellbeing.

Crematorium

NPHS agrees that a reduction in carbon impact from the diesel-fuelled cremator is desirable. Replacement with an electric system will reduce harmful emissions such as PM2.5 and NO2.

Should the crematorium continue to operate NPHS supports use of alternative fuel or upgrade to an electric cremator.

Mahitahi Bayview subdivision (Maitai Valley) utilities and transport connections

NPHS Te Waipounamu supports the progression of trunk services and upgrades to transport connections which enable walking and cycling. It is recommended that eBUS services are scheduled at an increased frequency during peak hours to support commuters from Mahitahi to work and school and vice versa.

Kitchenwaste

NPHS Te Waipounamu supports the joint partnership (between NCC and TDC) to explore the viability of a kitchenwaste collection service that will look at the diversion of kitchenwaste from landfill for composting, fertilizer production, and/or energy generation.

It is unclear what waste comes under 'kitchenwaste' e.g. food waste, etc. We recommend making this clear.

NPHS Te Waipounamu has an interest in where the kitchenwaste disposal/composting plant might be located.

There have been significant negative impacts on people's health and wellbeing as a result of the smell from Christchurch's composting plant located in Bromley.

Rutherford Park play space

NPHS Te Waipounamu supports the development of the Rutherford Park play space. The State of Play report – Te Tau Ihu 2022 identified Playing and Playing on a playground as the top two activities tamariki in Te Tau Ihu spend time doing.¹⁴ We encourage the inclusion of play equipment that facilitates and promotes active recreation providing for a diverse range of ages and abilities. Accessible play equipment should be prioritised to provide equity for all. A good example of an accessible playground is Magical Bridge Claudelands Park¹⁵, located near Hamilton.

Climate Change and Climate Change Strategy

NPHS-Te Waipounamu commends council for identifying climate change as a key priority. Climate change has been described by the World Health Organization as the biggest threat to health in the 21st century.

NPHS Te Waipounamu has been involved in the climate change risk assessment and we support councils' intention to continue community engagement through the next process. Considering equity in the engagement process will be important as in many cases, the most affected people are those who already experience inequitable health and wellbeing outcomes, including those with physical and mental health needs, disabled people, older adults, children, low-income households, and Māori. Generally, those who have historically contributed the least to current climate change (in terms of emissions) are disproportionately affected. More direct impacts include: mental illness/distress, undernutrition, respiratory diseases, cardiovascular diseases, heat-sensitive diseases, infectious diseases/spread of vector-borne illness, allergies, injuries.

NPHS-Te Waipounamu is supportive of the development of a strategy however, given the climate change risk assessment is across both Nelson and Tasman, we strongly recommend council amalgamate with Tasman's Climate Response Strategy and Action Plan. Climate change is a global issue and requires a collaborative approach between communities, government and non-government agencies to action. This could divert the time and money spent on strategy development to climate action.

In addition, TDC have been explicit in the amount of money they are allocating to climate change challenges over the next 10 years. It is recommended NCC does the same.

Our public health colleagues in Ōtautahi/Christchurch worked with Christchurch City Council and Environment Canterbury to develop a report Climate Change and Health in Waitaha Canterbury and are looking to expand the report across Te Waipounamu. We would value discussing this opportunity with you and other climate

change staff within our Te Taihū councils.

The Nelson Tasman Climate Forum plays a critical role in our community, bringing people and organisations together for climate action. Most of their workers are volunteers. Volunteer burnout is on the rise and organisations who rely on volunteers' risk being unsustainable.

Recommend NCC adopt a joint Climate Change Strategy with TDC.

Recommend NCC allocate funds for climate change challenges over the next 10 years

Recommend council support the funding application from the Nelson Tasman Climate Forum.

Smokefree Vapefree Outdoor Policy

As mentioned in our submission to the 2021-2031 LTP, NPHS Te Waipounamu recommends that TDC develops a Smokefree Vapefree Outdoor Policy. We are encouraging all councils in Te Taihū to do this following suit from other councils across Aotearoa New Zealand with, the potential of a collaborative approach and the prospect of a regional policy.

A policy such as this could ban smoking and vaping at:

- Council events
- Council buildings and facilities, carparks and bus stops,
- Town Centre
- Beaches
- Walkways and Cycleways

NPHS Te Waipounamu would like to work with NCC staff on this initiative. Reducing the prevalence of smoking and vaping and de-normalising smoking and vaping behaviour is one way that Council can improve the health and wellbeing of Tasman communities.

Warmer kiwi home grant funding

NPHS Te Waipounamu recommends the continuation of Council's support for the warmer kiwi home grant funding scheme. It is understood that grants to fully fund home insulation to high deprivation communities are provided by the scheme. NPHS Te Waipounamu would like to stress the importance of warmer drier homes from both an energy efficiency point of view and a health perspective. People who live in warmer drier homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness. Poor housing exacerbates existing health conditions and heighten the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shift the cost of what is primarily a housing problem onto the health and social services sectors.¹⁶

NPHS Te Waipounamu encourages NCC to reinstate the Eco Home Advisor role that provided a personalised service to homeowners on how to make homes more energy efficient in the cost-effective way. This service is needed more than ever as the community navigate their way through the current recession.

Recommend continuation of funding.

Recommend reinstating Eco Home Advisor role.

Alignment of policies and projects

NPHS Te Waipounamu recommends greater alignment of council policies and procedures. We have received feedback from a number of NCC staff that they are not always aware of what other departments are doing that impact their work. In addition, there are some inconsistencies through both the LTP and other consultation documents.

Revenue and Financing Policy

NPHS Te Waipounamu commends council for basing the Flood Protection Rate on land value as this supports a more equitable payment approach. We recommend this approach based on land value is also applied to Stormwater.

Similarly, NPHS Te Waipounamu supports the option for the New Recovery Rate to also be based on land value. However, we question whether a recovery rate that is planned to cease in ten years is sustainable. This short term, 'one off' type planning contradicts other parts of the LTP which state we expect more natural disasters and intense storm events to come our way in the future (p.g.49 Consultation Document). These events will again, require recovery costs.

NPHS-Te Waipounamu encourages council to add wording that gives full effect to Te Ture Whenua Māori Act. This will ensure that the mana and tino rangatiratanga that Māori exercise over their lands is recognised and provided for and will support achieving health equity for Māori

Recommend: Stormwater rate is based on land value.
Support: Option to base the New Recovery Rate on land value but recommend council reconsider capturing this cost under general rates as more natural disasters are expected in the next 10 years and beyond.
Support additional wording that gives full effect to Te Ture Whenua Māori Act

Name
NPHS-Te Waipounamu Sub NCC LTP 2024 230424 FINAL (003).pdf

26 April 2024

Nelson City Council
110 Trafalgar Street
Nelson, 7010

Tēnā koutou,

Submission on Nelson City Council's Draft Long Term Plan 2024/2034

1. Thank you for the opportunity to submit on the Draft Long Term Plan 2024/2034. This submission has been compiled on behalf of the National Public Health Service (NPHS) Te Waipounamu, Health New Zealand, Te Whatu Ora. NPHS Te Waipounamu services the South Island including Whakatū Nelson.
2. NPHS Te Waipounamu recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956. Pae Ora requires the health sector, as one of its roles, to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.
3. This submission responds to some of the specific questions provided in the Draft Long Term Plan 2024/2034 Consultation Document.
4. This submission sets out particular matters of interest and concern to NPHS Te Waipounamu.

General Comments

5. We welcome the opportunity to comment on the Draft Long Term Plan 2024/2034. Health and wellbeing are influenced by a wide range of factors beyond the health sector. These factors are often referred to as the 'social determinants of health', and can be described as the environmental, economic, and social conditions in which

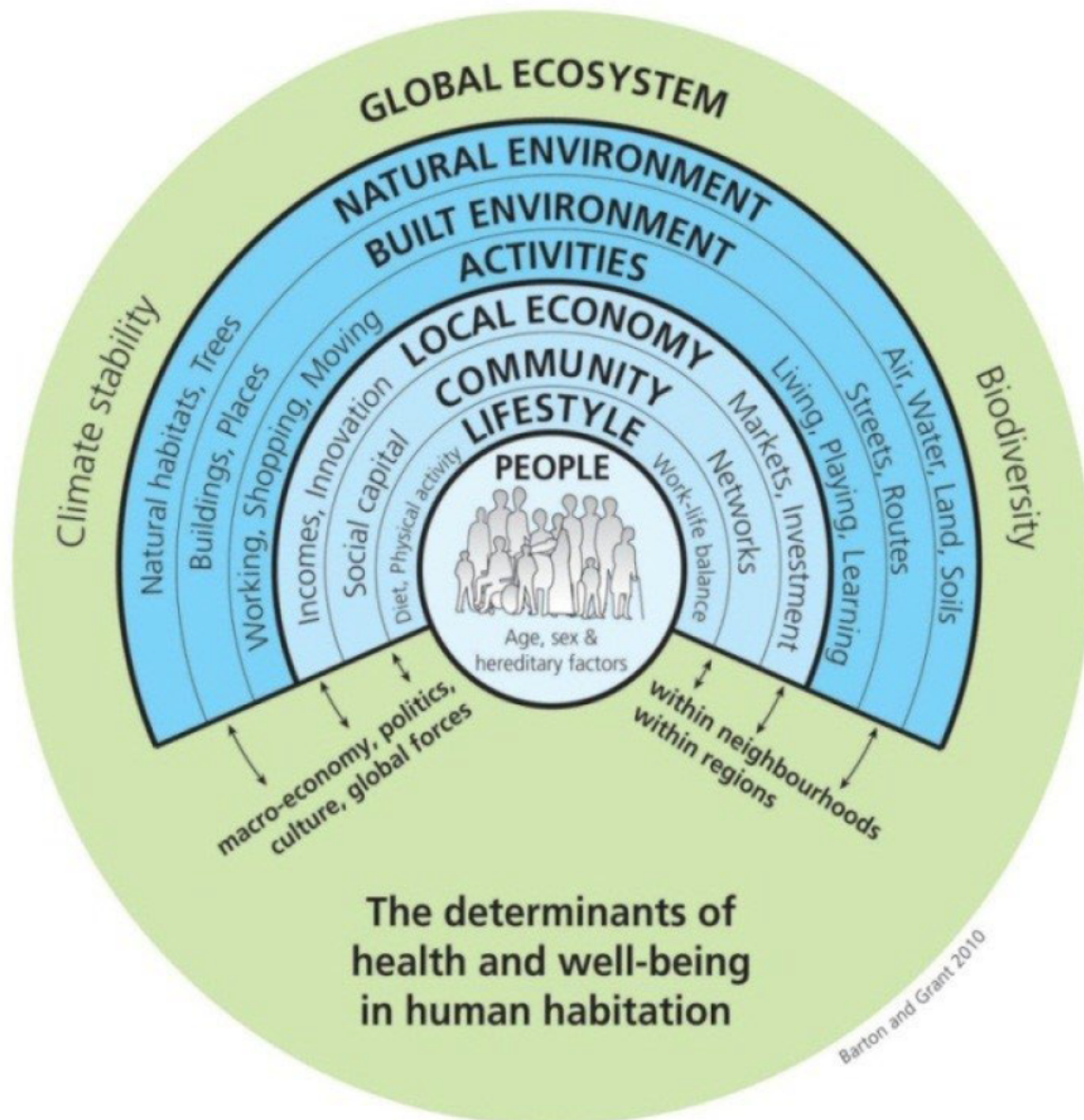
people are born, grow, live, work and age.¹ The diagram² below shows how the various influences on health are complex and interlinked.

6. The Draft Long Term Plan 2024/34 is an opportunity for Nelson City Council to influence these determinants of health by prioritising funds for actions that support health and wellbeing. Initiatives to improve health and wellbeing outcomes must involve organisations and groups beyond the health sector, such as local government, if they are to have a reasonable impact.³
7. NPHS Te Waipounamu is pleased to see public health impacts being considered throughout the Draft Long Term Plan 2024/34 with emphasis being placed on promoting and protecting natural environments, improving community facilities, and enhancing climate resilience. The community outcomes described are aligned with actions to improve the social and environmental determinants of health.

¹ Public Health Advisory Committee. 2004. The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health. Public Health Advisory Committee: Wellington.

² Barton, H and Grant, M. (2006) A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

³ McGinnis JM, Williams-Russo P, Knickman JR. 2002. The case for more active policy attention to health promotion. Health Affairs, 21(2): 78 - 93.



Specific comments

Draft Plan Topic	Discussion	Recommendation / Support
Rates affordability Pg. 13	Maintaining essential infrastructure that supports urban intensification, climate action and environmental projects, community organisations and facilities is essential to the health and wellbeing of current and future generations. Whilst we recognise the need for the proposed rates increase to fund services and projects that promote the four wellbeing's, we acknowledge that rate increases will inequitably impact disadvantaged populations, particularly older people on fixed incomes and single or low-income families. As highlighted in He piki tūranga, he piki kotuku – The future for Local Government report, the overall model of funding local government functions and services is unsustainable, and rates cannot continue to rise indefinitely⁴. We support the development of stronger funding and commissioning relationships between central and local government. The risk to public health of future generations from deteriorating assets, outweighs the benefits of rates remaining unchanged. However, given the current cost of living issues, it is important that rate assessments include the potential to exacerbate existing inequities amongst rate payers. NPHS noted a reduced budget for cycle lane line markings. Cycle markings are important as they increase the perception of safety for users. This type of investment into better active transport and micromobility environments delivers a range of social, environmental and economic benefits which include reduced congestion, emissions, and increased health and wellbeing. Investment in walking and cycling infrastructure can save costs long term by freeing up road and parking space and reduce costs for additional road capacity, maintenance and transport infrastructure for motor vehicles.⁵ In addition, cycling saves people money to spend in their local communities. Evidence suggests those who cycle are more likely to stop in and spend money at shops.⁵ Cycle lanes in Nelson urban retail areas would support the retail and hospitality industry and help to revitalise Nelson city centre. There are concerns relating to the potential of the reduction in air quality reporting, and the ability of the public to react or respond to exceedances in real time. It is important to note that whilst this LTP suggests a reduced investment in maintenance costs for Parks and Reserves, it also suggests significant investment into new community	Support option 1 Recommend council invest into maintaining cycle lane markings. Recommend council retain regular reporting of air quality.

⁴ Review into the Future for Local Government (2023) He piki tūranga, he piki kotuku, Wellington: New Zealand

⁵ NZ Transport Agency Waka Kotahi. (2016). Benefits of investing in cycling in New Zealand communities. <https://www.nzta.govt.nz/assets/Walking-Cycling-and-Public-Transport/docs/benefits-of-investing-in-cycling/cyclelife-benefits-booklet.pdf>

	facilities such as playgrounds. The wellbeing benefits of both these amenities are high. Therefore, it is essential that investment is balanced in a way that means existing facilities can be upgraded to meet their potential and that any new facilities built are able to be fit for purpose and maintained to a high level.	
Council's forestry approach Pg. 24	NPHS Te Waipounamu supports the exit of commercial forestry as it provides for a holistic approach to the management of NCC's native and exotic forests. This option proposes to develop a long-term asset for the community with improved environmental, recreational and social outcomes. Trees are good for our natural environment as they absorb carbon from the atmosphere, support flood mitigation and encourage biodiversity.⁶	Support option 2
Housing Reserve Fund changes Pg. 31	NPHS Te Waipounamu recommends retention of the current approach to support the delivery of social and affordable housing, where applications are open to iwi trusts and those who are registered as not-for-profit Community Housing Providers by the Community Housing Regulatory Authority. NPHS Te Waipounamu recommends that all new builds are designed for sustainability and community resilience (such as Green Star and Green Star Communities⁷) and support accessibility implementing universal design principles⁸. Housing development should be closely tied with active and public transport infrastructure.	Support option 1 Recommend: a separate line item is created to provide additional funding to support and work with partners to develop and provide accommodation for vulnerable and high need residents.
All-weather sports turf Pg. 33	It is not clear what drainage solutions have already been tried, where the location of the turf would be and who would benefit from the turf. It is unclear whether there has been significant enough investment into improving drainage at existing fields to enable increased usage in wetter conditions. If improving drainage worked, it would provide a solution that has co-benefits for the environment, sporting community and rate payers. We are in support of enabling more entry level players to participate in sport when they may otherwise not be able to due to, such as with wet grounds. People active in sports have, in general, better health than those who do not participate in sports, because they are physically and mentally prepared for the challenges of sports, abilities that in many cases can be transferred to other parts of life.⁹ However, we know that if we don't take important steps to mitigate climate change, such as reducing emissions and microplastics, the health of future generations will be worse off. Could a more nature-based solution be taken to improve drainage for example planting of trees and plants to support water absorption.	Recommend providing more information for public consultation.

⁶ The New Zealand Story Group. (n.d.). The Country on a tree-planting mission. New Zealand Story. Retrieved March 19, 2023, from <https://www.nzstory.govt.nz/stories/the-country-on-a-tree-planting-mission/#:~:text=Trees%20are%20good%20for%20our,good%20for%20the%20economy%20too!>

⁷ <https://nzgbc.org.nz/green-star-communities>

⁸ <https://www.branz.co.nz/universal-design/>

⁹ Holt N.L., Neely K.C., Slater L.G., Camire M., Cote J., Fraser-Thomas J., MacDonald D., Strachan L., Tamminen K.A. A grounded theory of positive youth development through sport based on results from a qualitative meta-study. *Int. Rev. Sport Exerc. Psychol.* 2017;10:1–49. doi: 10.1080/1750984X.2016.1180704

Tāhunanui Beach facilities Pg. 35	NPHS Te Waipounamu supports the development of Tāhunanui Beach facilities. This includes the provision of a new, fit for purpose building for the Surf Lifesaving Club close to the beach. However, it is important that sea level rise and the impact on the marine and foreshore environment is considered. Supporting this development may encourage the growth and retention of volunteer surf lifesavers, creating a safer environment at the beach. It was noted that Council's independent report identified "that there is a deficit in meeting levels of service for sports facilities at the Tāhunanui Beach. The most urgent relating to the Surf Lifesaving Club's facilities, the safety of their members, and the ability to respond to emergencies. Changing facilities for the sports fields (especially women, girls, accessible and non-gendered provision), storage facilities, and the lack of a sports hub (social/meeting rooms) contribute to the case."	Support option 2 Recommend the implementation of universal design standards in all facilities and the inclusion of gender-neutral toilets, supporting recreation opportunities for all ages and abilities. Recommend considering sea level rise and environmental impact.
Arts Hub Pg. 35	NPHS Te Waipounamu supports the purchase of an existing building and establishment of an arts hub. There is a growing body of evidence showing how arts and creativity can make a significant difference to people's health and wellbeing.¹⁰ NPHS strongly recommends that equity and inclusiveness is considered in all aspects of the facility, including all ages, demographics and physical abilities.	Support option 2 Recommend the following is implemented in the development of an arts hub: - Universal design standards - Arts programmes that support culture (including Māori, Pacifica, former refugee) and diversity.
Civic investment Pg. 40	NPHS Te Waipounamu supports the review of options for Civic House and the Elma Turner Library. NPHS Te Waipounamu understands that there will be considerable consultation on the topic in future (including the next LTP in 3 years' time) as options get formalised. In the 2021- 2031 LTP a Library Precinct Redevelopment was proposed to be built to Green Star 5 ratings and be built as a climate change-resilient building. NPHS Te Waipounamu recommends that these standards continue to be in the forefront of all plans going forward. Sea level rise will also need to be factored in as previously commented on, with consideration of NCC's Coastal Inundation maps. In 2022, we engaged with NCC on the project exploring the development of a new library/hub. We provided written feedback to NCC in August 2022. This feedback was developed from conversations with staff across the health system and included health and wellbeing considerations. We recommend the detail of this feedback is considered early on in this project. We are happy to provide the feedback again on request.	Support in principle. Recommend new developments are built to: - Green Star 5 rating - Climate change resilient - Universal design standards Engage NPHS-Te Waipounamu early in the development of this project.

¹⁰ Rosie Dow, Katey Warran, Pilar Letrondo, Daisy Fancourt. (2023). The arts in public health policy: progress and opportunities. The Lancet Public Health. [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(22\)00313-9/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(22)00313-9/fulltext)

Bridge to Better project Pg. 40	NPHS Te Waipounamu supports in principle, pending review of the concept design proposed to be consulted on in May 2024. NPHS Te Waipounamu supports the water infrastructure upgrade that will provide capacity and resilience to cater for hundreds of homes in the city centre. Well-designed inner-city living can provide compact, connected, integrated, resilient and inclusive homes. When done well, these homes can have positive impacts on health, through social connection and cohesion, civic participation, air quality and promoting physical activity. Sufficient green and recreational space will need to be considered for Inner city living environments and we support the implementation of the Urban Greening Plan 2022. NPHS Te Waipounamu notes the importance of greenspace and trees in the context of climate change, particularly to reduce potential heat-related illness and mortality from rising temperature and in a heatwave event.¹¹ Urban communities are at risk of the urban heat island effect as many of the materials used in urban settings – brick, concrete and steel – trap heat and increase the overall temperature experienced in urban environments.¹² NPHS Te Waipounamu recommends that outdoor dining environments support a safe, healthy and cohesive environment and are: - Alcohol, smokefree and vape-free and free from associated advertising. - Accessible, encompassing universal design standards - Pedestrian and cycle friendly. - Conversant with Crime Prevention Through Environmental Design.	Support in principle, subject to review of further consultation.
Recreational access to Ngāti Koata whenua Pg. 41	NPHS Te Waipounamu supports the negotiation of a long-term recreational access agreement over Ngāti Koata whenua (land) providing important walking, running and mountain biking opportunities for residents and visitors to Nelson. It is understood this agreement would not involve purchasing any land at this time. Where appropriate (and in discussion with Ngāti Koata), kaupapa Māori signage could be installed to promote a bilingual signage environment. Signage has the potential to support the revitalisation of Te Reo Māori, provide information on the whakapapa of the whenua and contribute to decolonising, all which is required to achieve Pae Ora (health futures equity for all). It is essential that NCC works with mana whenua to identify these opportunities.	Support
Extend East West cycle way link Pg. 41	NPHS Te Waipounamu fully supports the creation of an active travel link from the Maitai/Brook areas in the east to the Railway Reserve corridor in the west. This project would improve the cycle connections across the city and address safety for cyclists using	Support

¹¹ Te Mana Ora. 2023. Climate Change and Health in Waitaha Canterbury: A scoping and profiling report to inform Health Impact Assessment. Ōtautahi Christchurch: Te Whatu Ora, Te Mana Ora, National Public Health Service. Accessed from: <https://www.cph.co.nz/wpcontent/uploads/ClimateChangeHealthWaitahaCanterbury.pdf>

¹² Te Mana Ora. 2023. Climate Change and Health in Waitaha Canterbury: A scoping and profiling report to inform Health Impact Assessment. Ōtautahi Christchurch: Te Whatu Ora, Te Mana Ora, National Public Health Service. Accessed from: <https://www.cph.co.nz/wpcontent/uploads/ClimateChangeHealthWaitahaCanterbury.pdf>

	the route. It is pleasing to see the route encompasses five schools and NMIT. Funding for more cycle connections should be prioritised, particularly with the funding for a shared pathway along Rocks Road removed from the draft Government Policy Statement on Land Transport. Active transport increases levels of activity and have multiple positive health outcomes, including mental health and wellbeing.	
Crematorium Pg. 42	NPHS agrees that a reduction in carbon impact from the diesel-fuelled cremator is desirable. Replacement with an electric system will reduce harmful emissions such as PM2.5 and NO2.	Should the crematorium continue to operate NPHS supports use of alternative fuel or upgrade to an electric cremator.
Mahitahi Bayview subdivision (Maitai Valley) utilities and transport connections Pg. 42	NPHS Te Waipounamu supports the progression of trunk services and upgrades to transport connections which enable walking and cycling. It is recommended that eBUS services are scheduled at an increased frequency during peak hours to support commuters from Mahitahi to work and school and vice versa.	Support Consider increased bus frequency at peak times to/from Mahitahi into Nelson.
Kitchenwaste Pg. 42	NPHS Te Waipounamu supports the joint partnership (between NCC and TDC) to explore the viability of a kitchenwaste collection service that will look at the diversion of kitchenwaste from landfill for composting, fertilizer production, and/or energy generation. It is unclear what waste comes under 'kitchenwaste' e.g. food waste, etc. We recommend making this clear. NPHS Te Waipounamu has an interest in where the kitchenwaste disposal/composting plant might be located. There have been significant negative impacts on people's health and wellbeing as a result of the smell from Christchurch's composting plant located in Bromley. ¹³	Support Recommend making explicit what comes under 'Kitchenwaste' or look to rename.
Rutherford Park play space Pg. 42	NPHS Te Waipounamu supports the development of the Rutherford Park play space. The State of Play report – Te Tau Ihu 2022 identified Playing and Playing on a playground as the top two activities tamariki in Te Tau Ihu spend time doing. ¹⁴ We encourage the inclusion of play equipment that facilitates and promotes active recreation providing for a diverse range of ages and abilities. Accessible play equipment should be prioritised to provide equity for all. A good example of an accessible playground is Magical Bridge Claudelands Park ¹⁵ , located near Hamilton.	Support
Climate Change and Climate Change Strategy Pg. 8	NPHS-Te Waipounamu commends council for identifying climate change as a key priority. Climate change has been described by the World Health Organization as the biggest threat to health in the 21st century.	

¹³ <https://www.rnz.co.nz/news/national/490462/bromley-residents-say-they-re-fed-up-with-compost-stench-it-s-torture-it-s-driving-me-crazy>

¹⁴ State of Play - Te tau Ihu. (2022). <https://property.marlbrough.govt.nz/trimapi/api/trim/2288397>

¹⁵ <https://www.magicalbridge.co.nz/magical-bridge-claudelands-park/>

	NPHS Te Waipounamu has been involved in the climate change risk assessment and we support councils' intention to continue community engagement through the next process. Considering equity in the engagement process will be important as in many cases, the most affected people are those who already experience inequitable health and wellbeing outcomes, including those with physical and mental health needs, disabled people, older adults, children, low-income households, and Māori. Generally, those who have historically contributed the least to current climate change (in terms of emissions) are disproportionately affected. More direct impacts include: mental illness/distress, undernutrition, respiratory diseases, cardiovascular diseases, heat-sensitive diseases, infections diseases/spread of vector-borne illness, allergies, injuries. NPHS-Te Waipounamu is supportive of the development of a strategy however, given the climate change risk assessment is across both Nelson and Tasman, we strongly recommend council amalgamate with Tasman's Climate Response Strategy and Action Plan. Climate change is a global issue and requires a collaborative approach between communities, government and non-government agencies to action. This could divert the time and money spent on strategy development to climate action. In addition, TDC have been explicit in the amount of money they are allocating to climate change challenges over the next 10 years. It is recommended NCC does the same. Our public health colleagues in Ōtautahi/Christchurch worked with Christchurch City Council and Environment Canterbury to develop a report Climate Change and Health in Waitaha Canterbury and are looking to expand the report across Te Waipounamu. We would value discussing this opportunity with you and other climate change staff within our Te Taihū councils. The Nelson Tasman Climate Forum plays a critical role in our community, bringing people and organisations together for climate action. Most of their workers are volunteers. Volunteer burnout is on the rise and organisations who rely on volunteers' risk being unsustainable.	Recommend NCC adopt a joint Climate Change Strategy with TDC. Recommend NCC allocate funds for climate change challenges over the next 10 years Recommend council support the funding application from the Nelson Tasman Climate Forum.
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Other comments regarding the LTP

Topic	Discussion	Recommendation / Support
Smokefree Vapefree Outdoor Policy	As mentioned in our submission to the 2021-2031 LTP, NPHS Te Waipounamu recommends that TDC develops a Smokefree Vapefree Outdoor Policy. We are encouraging all councils in Te Taihū to do this following suit from other councils across Aotearoa New Zealand with, the potential of a collaborative approach and the prospect of a regional policy. A policy such as this could ban smoking and vaping at: - Council events - Council buildings and facilities, carparks and bus stops, - Town Centre - Beaches - Walkways and Cycleways NPHS Te Waipounamu would like to work with NCC staff on this initiative. Reducing the prevalence of smoking and vaping and de-normalising smoking and vaping behaviour is one way that Council can improve the health and wellbeing of Tasman communities.	Recommend that NCC works closely with NPHS Te Waipounamu to develop a Smokefree Vapefree Outdoor Policy.
Warmer kiwi home grant funding	NPHS Te Waipounamu recommends the continuation of Council's support for the warmer kiwi home grant funding scheme. It is understood that grants to fully fund home insulation to high deprivation communities are provided by the scheme. NPHS Te Waipounamu would like to stress the importance of warmer drier homes from both an energy efficiency point of view and a health perspective. People who live in warmer drier homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness. Poor housing exacerbates existing health conditions and heighten the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shift the cost of what is primarily a housing problem onto the health and social services sectors.¹⁶ NPHS Te Waipounamu encourages NCC to reinstate the Eco Home Advisor role that provided a personalised service to homeowners on how to make homes more energy efficient in the cost-effective way. This service is needed more than ever as the community navigate their way through the current recession.	Recommend continuation of funding. Recommend reinstating Eco Home Advisor role.
Alignment of policies and projects	NPHS Te Waipounamu recommends greater alignment of council policies and procedures. We have received feedback from a number of NCC staff that they are	Greater alignment of council policies and procedures.

¹⁶ 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

	not always aware of what other departments are doing that impact their work. In addition, there are some inconsistencies through both the LTP and other consultation documents.	
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Other Related Consultations

Consultation	Discussion	Recommendation / Support
Revenue and Financing Policy	NPHS Te Waipounamu commends council for basing the Flood Protection Rate on land value as this supports a more equitable payment approach. We recommend this approach based on land value is also applied to Stormwater. Similarly, NPHS Te Waipounamu supports the option for the New Recovery Rate to also be based on land value. However, we question whether a recovery rate that is planned to cease in ten years is sustainable. This short term, 'one off' type planning contradicts other parts of the LTP which state <i>we expect more natural disasters and intense storm events to come our way in the future (p.g.49 Consultation Document)</i>. These events will again, require recovery costs. NPHS-Te Waipounamu encourages council to add wording that gives full effect to Te Ture Whenua Māori Act. This will ensure that the mana and tino rangatiratanga that Māori exercise over their lands is recognised and provided for and will support achieving health equity for Māori.	Recommend: Stormwater rate is based on land value. Support: Option to base the New Recovery Rate on land value but recommend council reconsider capturing this cost under general rates as more natural disasters are expected in the next 10 years and beyond. Support additional wording that gives full effect to Te Ture Whenua Māori Act
Draft Policy on Remission and Postponement of Rates on Māori Freehold Land	As stated above NPHS-Te Waipounamu encourages council to add wording that gives full effect to Te Ture Whenua Māori Act as this will support achieving health equity for Māori. Enabling this rates remission supports the necessary decolonisation required to achieve equitable health outcomes for Māori.	Support changes which give full effect to Te Ture Whenua Māori Act.
Significance and Engagement Policy	NPHS- Te Waipounamu recommends rewording: 4.3 "Council's engagement with Māori and iwi aligns with the Treaty principles of partnership, protection and participation. <u>the articles of Te Tiriti o Waitangi.</u> <i>Treaty of Waitangi (Te Tiriti o Waitangi*) has the same meaning as the word 'Treaty' as defined in section 2 of the Treaty of Waitangi Act 1975. Section 2 of the Treaty of Waitangi Act 1975 refers to both to 'Te Tiriti o</i>	Recommend rewording: 4.3 "Council's engagement with Māori and iwi aligns with the Treaty principles of partnership, protection and participation. <u>the articles of Te Tiriti o Waitangi.</u> <u>Provide sufficient information and resource to Māori and iwi to enable their effective and genuine participation in decision-making</u>

	Waitangi' (Te Tiriti) and the 'Treaty of Waitangi' (The Treaty). It is deeply problematic to use the term the Treaty of Waitangi to refer to both Te Tiriti (Māori text) and the Treaty (the English version). These are two separate documents that say two distinct things: acceptance of the Waitangi Tribunal WAI 1040 (ruling that Ngāpuhi never ceded sovereignty) and the legal doctrine of contra proferentem (recognising the preferred authority of the Māori text); or the contrary position embracing the English version which implies that Māori ceded sovereignty. In addition, the original Wai 2575 Hauora Report of Health Services and Outcomes Kaupapa Inquiry released in 2019 made it clear that the 3P's (partnership, protection and participation) were outdated and recommended new principles: Tino Rangatiratanga, Equity, Active Protection and Options. However, we strongly recommend council refers to the Articles of the Māori text rather than the principles. Implementing the articles of Te Tiriti o Waitangi into this strategy ensures full effect is given to Te Tiriti. General recommendations: - That consultation periods are extended beyond four-weeks when they are matters of greater public interest such as Plan Change 29. - That early engagement is offered where feedback is sought prior to formal consultation. An example of this is TDC offering early engagement last year on this year's Long-Term Plan. This provided greater opportunity for feedback across the two consultation periods, which is helpful when there is a high volume of information being consulted on. - That assistance to complete submissions by calling the Customer Service Centre is offered for all consultations. It is noted that the following is included in NCC's LTP consultation document. This supports equity and greater community participation.  By calling the Customer Service Centre if you would like assistance to complete a submission on 03 546 0200	- Endeavour to Engage Māori and iwi early in decision-making processes. Recommend the following when engaging the public in consultation: - Extended consultation periods, early engagement. - Use social media platforms that will reach the youth population. - Utilise existing communication streams within schools, businesses and workplaces to advertise consultation opportunities. - Provide consultation documents in different forms e.g. create short videos summaries of large documents. These would need to appeal to a range of audiences and could include imagery, text and Te Reo Māori and sign language options. - Consider font size and colour (for people with low vision). - Offer alternative ways to give feedback e.g. video, audio or pictorial submissions.
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	Current engagement modalities employed by local government (e.g. web-based consultation documents, drop-in workshops) favour individuals with time, literacy skills, access to internet, and confidence to make a submission. Many local government issues such as climate resilience, transport, urban development etc. are specialised areas that are difficult to communicate well to the public – this leads to people with financial or other interests in issues being more likely to submit, and often in favour of status quo options. We support a move to more innovative community engagement beyond traditional options, where information gathered may better represent the range of voices within a community rather than those that are privileged enough to engage with the current approach.	- Co-design these ideas with different population groups so that they best meet their needs.
Draft Statement on fostering Māori participation in Council decision-making Te Whakaitiā i te urunga o Ngāi Māori ki te Kaunihera	NPHS-Te Waipounamu commends councils' intention for adopting such a statement which, if implemented will drive a genuine partnership in the exercise of kāwanatanga and rangatiratanga and support Pae Ora. Whilst there is mention of Te Taihira Treaty of Waitangi Settlement Acts 2014, there is no mention of Te Tiriti o Waitangi in this document. Given Te Tiriti o Waitangi is one of the underpinning documents outlining crown and Māori relations, it is essential for it to be included in this document. If the articles of Te Tiriti are embedded throughout council work, then the intentions set out in the statement will be achieved. In addition, tino rangatiratanga (sovereignty) of hapū and other Māori groupings must be recognised. It is important to reiterate that Ngāpuhi never ceded sovereignty (WAI 1040) and that other hapū also retained their sovereignty. Under the iwi Māori engagement hui outlined, we are concerned there may be a gap for engagement around social wellbeing. We understand regular hui happens with iwi Pou Taiao and council under Te Ohu Taiao however, there doesn't seem to be an explicit forum for the 'social' wellbeing of the 4 wellbeing's. For example, the processes that lead to exemptions of the Alcohol Advertising Policy within the Saxton Field Management Plan and the subsequent process to review the Policy failed to engage iwi meaningfully. We are aware council attempted to engage with Te Ohu Taiao however, question whether this is the right forum for a matter that is more related to social rather than environmental wellbeing.	Recommendations: Additional wording below: ...This includes an intention to: - <i>Increase council's understanding of te reo Māori me ōnā Tikanga Māori and Te Tiriti o Waitangi.</i> - <i>Increase number of Māori staff and Māori in leadership roles</i> - <i>Increase number of Māori elected representatives</i> - <i>Increase number of Māori on community boards and committees</i> - <i>Embed Te Tiriti o Waitangi</i> Recommend council consider how they will adjust their own planning activities to support local expressions of tino rangatiratanga. Recommend council consider how resource and funding could be allocated to iwi, hapū and whānau to undertake this engagement at a level that meets their needs. NPHS would welcome the opportunity to discuss this further with council.

	While most government agencies are mandated to undertake engagement with Māori, this has not been met with appropriate resourcing for Māori. Māori are under-capacity and under-funded to carry out an increasing workload and the pressure to respond to requests can have negative impacts on wellbeing. NPHS would welcome the opportunity to discuss this further with council and iwi.	
Infrastructure Strategy	NPHS-Te Waipounamu commends council on a strategy that meaningfully considers public health and wellbeing throughout. The objectives it sets out to achieve related to managing risks associated to natural hazards and climate change, maintaining, renewing, and upgrading infrastructure to meet the needs of urban intensification (as opposed to green field development), iwi engagement, active transport infrastructure, and the environment, will support public health outcomes. Under Table 6 Infrastructure Objective 4: Maintain or improve public health and safety, and environmental outcomes, we commend council for identifying options which have both health and environmental co-benefits to reduce traffic congestion and are in line with urban intensification. We recommend council consider the options as system level changes vs individual behaviour change. System level change such as: investing in active transport infrastructure, bus priority lanes, increased parking charges are required to enable individuals' behaviour change i.e. to shift from driving a car to cycling to work. Whereas, solely relying on individual behaviour change, without system changes such as through providing education, will have limited success. Both are required and we recommend council prioritise solutions to congestion that have environmental and health co-benefits.	Recommend council prioritise solutions to congestion that have environmental and health co-benefits.

DRAFT Council Activity Summaries for the Long-Term Plan 2024–2034

Draft Plan Reference	Discussion	Recommendation / Support
General comments	There appears to be no mention of Te Tiriti o Waitangi and Crown obligations. Refer to comments mentioned above regarding Te Tiriti o Waitangi.	Recommend inclusion of Te Tiriti o Waitangi.

	The service level tables and indicators appear to have included areas that can easily be measured and relatively easily achieved – however, these do not always seem to reflect the priorities or community outcomes outlined in the accompanying narrative for each section.	
Introduction Pg. 2	It is noted that under significant negative effects, health and wellbeing is not explicitly mentioned.	Recommend inclusion of health and wellbeing as a consideration.
Transport – significant negative effects. Pg. 7	Transport is a key determinant of health. There appears to be insufficient focus on transport and the impacts it has on health and wellbeing. It is noted the acknowledgement of greenhouse gas emissions, accelerated climate change and environmental degradation as negative effects.	Recommend explicit recognition of negative impacts of road transport on health; and positive impact of increased active transport.
Transport – service level, performance measures, targets. Pg. 7	It is noted that there is a strong focus on road transport. Levels of service relating to walking and cycling modes has been removed to streamline levels of service. It is also noted that “Nelson’s crash rate is overrepresented at intersections, particularly with cyclists and elderly road users. This results in increased social cost and deters active mode use (those who use forms of transport that involve physical exercise, such as walking and cycling).”	Recommend stronger focus and increased safety initiatives relating to active transport.
Water supply Pg. 16-27	As stated above, many influences on health and wellbeing lie outside of health sector, and local government has a major role in improving population health outcomes, including through drinking water. NPHS Te Waipounamu supports NCC’s proposed investment into drinking water, stormwater, and wastewater infrastructure. NPHS Te Waipounamu notes the importance of maintaining and renewing critical water infrastructure for the protection of community and environmental health and wellbeing. It is noted that that there is no mention of cultural significance in this section. Freshwater is a taonga for Māori. Māori recognise water bodies as having mauri (life force) and great care must be taken in managing human impacts on freshwater. ¹⁷	Recommend cultural implications are considered and acknowledged.
Wastewater Pg. 28-38	It is noted that under cultural considerations and impacts there is only brief mention of negative impacts on ‘cultural wellbeing’ only. There is	Recommend cultural significance and negative health impacts has greater consideration, especially under risks.

¹⁷ Stepping into freshwater. (2020). Ministry for the Environment. <https://environment.govt.nz/publications/our-freshwater-2020/stepping-into-freshwater/#:~:text=Freshwater%20is%20a%20taonga%20for,managing%20human%20impacts%20on%20freshwater.>

	also limited consideration of health impacts especially under risks and negative impacts. Under 'any intended changes to the level of service' (pg. 32), we are wondering what criteria are used to determine if complaints are valid.	
Stormwater Pg. 39-48	It is noted that under cultural considerations and impacts there is only brief mention of negative impacts on 'cultural wellbeing' only. There is also limited consideration of health impacts especially under risks and negative impacts. Under 'intended changes to the level of service' (pg. 42), we are wondering what criteria are used to determine if complaints are justifiable.	Recommend cultural significance and negative health impacts has greater consideration, especially under risks.
Flood protection – p 49-58	It is noted that under cultural considerations and impacts there is only brief mention of negative impacts on 'cultural wellbeing' only. There is also limited consideration of health impacts especially under risks and negative impacts.	Recommend cultural significance and negative health impacts has greater consideration, especially under risks.
Solid waste Pg. 59-65	Support the detailed business case with NCC to determine approach for potential separation and collection of household food scraps, pending government regulations. NPHS Te Waipounamu is pleased to see this has been broadened to include household collection since the previous LTP. How household collection is funded may have an impact on who can afford the service. It is recommended that any funding scheme considers equity of access. In line with our recent Public Health Review of Nelson Tasman Draft Joint Waste Assessment, NPHS Te Waipounamu recommends council is more ambitious with its goal to reduce total waste to landfill by 10% per capita by 2030.	Recommend equity is considered in the kitchenwaste business case. Recommend council is more ambitious with its goal to reduce total waste to landfill by 10% per capita by 2030. Recommend allocating funds to manage waste from emergency events.
Environment Pg. 66-76	Service level table – does not seem to match priorities. It mentions alcohol under 'our communities are healthy, safe, inclusive, resilient and 'Fosters responsible sale and consumption of alcohol' but performance measure is focused on high-risk alcohol selling only. Alcohol is not mentioned in the narrative at all.	Recommend commentary around focusing on high-risk alcohol outlets under activity summary detail (not just in service level table). Two inspections per year does not sufficiently 'foster responsible sale and consumption'. Need to consider lower risk activities also.

	It is important to note the risk that a growing population and urban development has on environmental outcomes. It is essential that significant investment is made to ensure this does not cause further environmental degradation as this will only harm the health of future generations.	Recommend including reference to NCC's Urban Greening Plan 2022.
Rocks Road marine restoration Pg. 67	NPHS Te Waipounamu strongly supports the education campaign to encourage habitat restoration of the rock pools along Rocks Road commencing in 2024/25. We are pleased to see that reversing the decline and maintaining a healthy level of rock pool species is being prioritised to support and enhance marine life.	Support
Social Pg. 77-85	It is noted that under challenges affordable housing is mentioned as being the biggest social issue facing the NCC community. We understand council is looking at making changes to the Housing Reserve Fund but further detail of how council is supporting to reduce this could be provided. The Massey Home Affordability Index shows that the Nelson-Tasman region was the third least affordable region behind Auckland and Otago Lakes. ¹⁸	Recommend further detail on how council is working to address the social housing issue.
Pasifika Community priority projects support Pg. 79	NPHS Te Waipounamu strongly supports increased engagement with the Pasifika Community as this is both a priority population for the NPHS ¹⁹ and meets councils' responsibilities under the four wellbeing's. It is important to consider the range of Pacific ethnic-specific communities in Whakatū Nelson, s highlighted in table below, when	Support

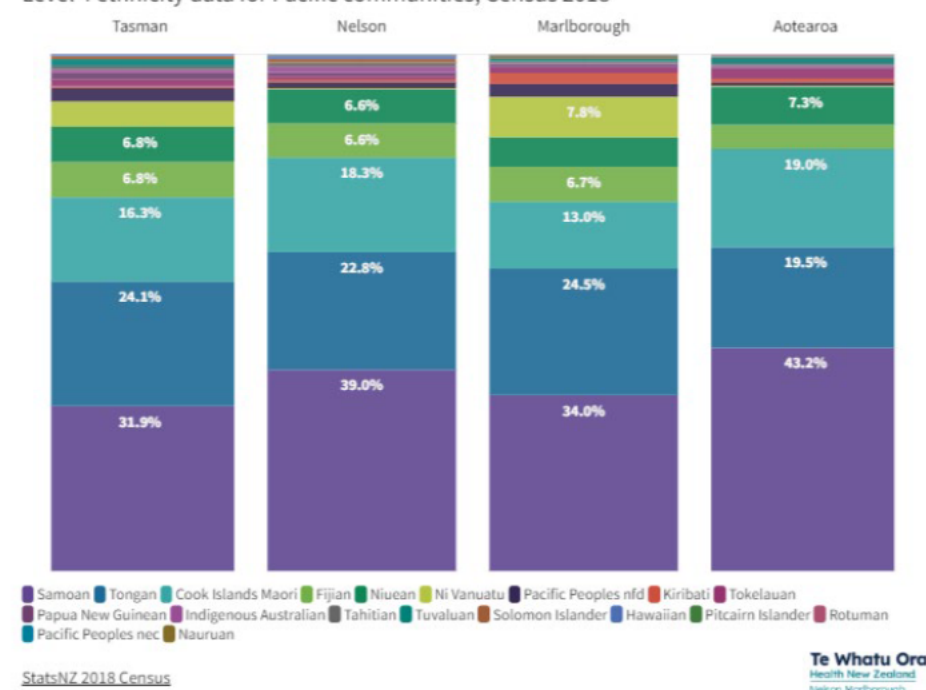
¹⁸ [Housing affordability worsens in Nelson-Tasman region | Stuff](#)

¹⁹ Te Whau ora – Equity Case Studies Volume 1 on <https://www.tewhatuora.govt.nz/publications/case-studies-on-equity-volume-i-and-volume-ii/> accessed 11/04/2024

engaging.

Pacific ethnic-specific communities

Level 4 ethnicity data for Pacific communities, Census 2018



Accessibility
strategy/audit

Pg. 79

NPHS Te Waipounamu strongly supports the development of an Accessibility Strategy and audit to identify areas where improvements can be made to existing recreational sites and amenities, as well as the accessways and pathways connecting them. A more accessible environment will benefit everyone, not just people with disabilities, but older people, those with young children, and people with temporary mobility issues. It is crucial that all types of disabilities are considered in the strategy (including but not limited to hearing, seeing, mobility, agility, psychiatric, speaking, learning and memory) as displayed in the graph below. We are keen to provide advice and support in the development of this strategy and audit.

Support

Engage NPHS is the development of this strategy/audit

	Disability Survey 2013 Type of disability Total disability Cause of disability <table border="1"> <thead> <tr> <th>Type of disability</th> <th>Aotearoa (%)</th> <th>Tasman, Nelson, Marlborough, West Coast (%)</th> </tr> </thead> <tbody> <tr> <td>Hearing</td> <td>8%</td> <td>9%</td> </tr> <tr> <td>Seeing</td> <td>4%</td> <td>3%</td> </tr> <tr> <td>Mobility</td> <td>12%</td> <td>15%</td> </tr> <tr> <td>Agility</td> <td>7%</td> <td>9%</td> </tr> <tr> <td>Intellectual</td> <td>2%</td> <td>2%</td> </tr> <tr> <td>Psychiatric</td> <td>5%</td> <td>5%</td> </tr> <tr> <td>Speaking</td> <td>3%</td> <td>3%</td> </tr> <tr> <td>Learning</td> <td>4%</td> <td>5%</td> </tr> <tr> <td>Memory</td> <td>3%</td> <td>5%</td> </tr> </tbody> </table> Source: StatsNZ 2013 Disability Survey West Coast is included in the Te Taihū region for the Disability Survey results Te Whatu Ora Health New Zealand Nelson Marlborough	Type of disability	Aotearoa (%)	Tasman, Nelson, Marlborough, West Coast (%)	Hearing	8%	9%	Seeing	4%	3%	Mobility	12%	15%	Agility	7%	9%	Intellectual	2%	2%	Psychiatric	5%	5%	Speaking	3%	3%	Learning	4%	5%	Memory	3%	5%	
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Learning	4%	5%																														
Memory	3%	5%																														
Parks and Active Recreation Pg. 86-95 Making parks and facilities more accessible Pg. 87	As mentioned in our submission to the 2021-2031 LTP, NPHS Te Waipounamu recommends that future reviews of reserves policies include all of the alcohol control and the smoke and vape free policies contained in the Saxton Field Reserves management plan to ensure consistency across the region. It may also be included in the general policies that are being developed as outlined on pg 8. NPHS Te Waipounamu recommends utilising an audit tool (such as PARCs²⁰) for assessing whether parks are meeting disability standards be utilised to ensure accessibility. The PARC tool was developed in collaboration with Hutt, Porirua and Wellington city councils, CCS Disability Action and the New Zealand Blind Foundation. The tool evaluates the accessibility, usability and safety of (a) routes and (b) facilities and amenities. The accessible routes section includes: (i) accessible parking spaces and (ii) path surfaces. The facilities and amenities encompass: (i) play areas including play richness, (ii) rest areas (iii) toilets and (iv) drinking fountains. Using such a tool to audit would identify where there are barriers (damaged footpaths, inaccessible playgrounds, toilets and seating) for people to use the spaces. In addition to above, audits should also review:	Recommend review includes smoke and vape free policies. Recommend using an accessibility audit tool for assessing parks and reserves and widening the audit as mentioned. NPHS Te Waipounamu would welcome the opportunity to discuss this further. Recommend investing in more community gardens, native and edible trees, outdoor murals, bike stands, lighting, signage/wayfinding and active transport connectivity. Recommend making explicit the alignment between these outcomes and the accessibility audit.																														

²⁰ Perry MA, Devan H, Fitzgerald H, Han K, Liu LT, Rouse J. Accessibility and usability of parks and playgrounds. *Disabil Health J.* 2018;11(2):221-229. doi:10.1016/j.dhjo.2017.08.011

	- Space for pump tracks, bike jumps - Appropriate seating and picnic tables - Community garden areas to support access to healthy food - Outdoor art features and murals - Fruit trees to support access to healthy food - Native plants and trees to support shading, biodiversity, flood protection and carbon sequestration - Covered bike stands - Adequate lighting for safety - Updating outdated facilities - Paths and connectivity to walking and cycling networks - Signage/ wayfinding – appropriate for low vision blind - Waste management – recycling bins etc An audit would highlight gaps and support prioritisation of upgrades. We recommend investment into the above amenities as this will have health and environmental co-benefits and increase the number of people using these spaces. Involving the community in volunteering initiatives such as planting trees and weed control could also be a way of supplementing necessary projects. Ecological restoration programs have the potential to enhance people's wellbeing if designed in ways that intentionally enable health and wellbeing benefits through access to fresh air, space to move, engagement with nature, and opportunities for genuine social connection, sense of achievement and optimism for the future.²¹ It was noted that the priorities outlined on pg 87 do not seem to fully align with the specific projects/actions proposed directly below. It is understood that making parks and facilities more accessible will be tied in with the accessibility audit mentioned earlier in the Draft Activities Summaries LTP 2024-2034 (pg 79).	Recommend involving community volunteers more in the management of parks and reserves such as tree planting and weed control. -Increase the awareness and opportunities for people to volunteer particularly younger people. - provide resources for communities to deliver on their neighbourhood's aspirations in council reserves.
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²¹ Marsh, P., Auckland, S., Dudley, T., Kindal, D., & Flies, E. (2023). A mountain of health benefits? Impacts of ecological restoration activities on human wellbeing. Wellbeing, Space and Society . <https://www.sciencedirect.com/science/article/pii/S2666558123000064>

Saxton Field Activity Management Draft AMP	NPHS Te Waipounamu fully supports development of an accessible playground as mentioned on pg 37. It is understood that the project has been discussed at community forums with key stakeholders (Blind Low Vision New Zealand, Ministry of Disabled People and parents of children with a disability). We recommend that they continue to be consulted with throughout the project lifespan. Provision of a playground that supports inclusive recreation should be prioritised so that Saxton Field is considered a place of recreation for all abilities. The State of Play report – Te Tau Ihu 2022 identified Playing and Playing on a playground as the top two activities tamariki in Te Tauihu spend time doing.⁶ We encourage the inclusion of play equipment that facilitates and promotes active recreation providing for a diverse range of ages and abilities. Accessible play equipment should be prioritised to provide equity for all. A good example of an accessible playground is Magical Bridge Claudelands Park⁷, located near Hamilton. It is understood that \$20,000 every alternate year for accessibility improvements has been allocated for across all Saxton Field facilities. NPHS Te Waipounamu fully support this initiative to increase equity and accessible sports infrastructure. NPHS Te Waipounamu has been engaged in the discussions around the future of Policy 4.8.2.3 of the Saxton Field Management Plan which states – The advertising of alcohol shall not be permitted on Saxton Field, apart from price and product schedules at point of sale. Council took a courageous stance in 2021 to include this policy and to amend it would be a backward step. Alcohol control policies which serve to limit the users of reserves, including playgrounds, to exposure to alcohol consumption, advertising and sponsorship can support young people. Research shows that exposure to alcohol marketing for example, can result in young people drinking earlier in their lives and drinking larger amounts of alcohol. As commented in our submission to TDCs 2021 LTP, NPHS Te Waipounamu recommends that future reviews of reserves policies include all of the alcohol control policies contained in the Saxton Field Reserves management plan.	Support development of an accessible playground. Retain Policy 4.8.2.3 of the Saxton Field Management Plan which states – The advertising of alcohol shall not be permitted on Saxton Field, apart from price and product schedules at point of sale.
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Conclusion

7. NPHS Te Waipounamu does wish to be heard in support of this submission.
8. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.
9. Thank you for the opportunity to submit on the Draft Long Term Plan 2024/2034.

Ngā mihi,

**Vince Barry**

Regional Director
National Public Health Service
Te Waipounamu Region

Contact details

For and on behalf of NPHS Te Waipounamu

Nicola Gausel

Health in All Policies Advisor

LGOIMA s7(2)(a)

Hana Wilkinson

Taranaki Iwi

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LGOIMA s7(2)(a)

Rating Policies

Submitter Details

Submission Date: 24/04/2024

First name: Hana **Last name:** Wilkinson

Organisation: National Public Health Service
(NPHS) Te Waipounamu

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Suburb:

City:

Country: NZ

Postcode:

Email: LGOIMA s7(2)(a)

Daytime Phone: LGOIMA s7(2)(a)

Would you like to present your submission in person at a hearing?

If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please include this information in your submission.

☒ Yes

☒ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

Draft Policy on Remission and Postponement of Rates on Māori Freehold Land

Do you have any feedback on the Draft Policy on Remission and Postponement of Rates on Māori Freehold Land?

NPHS-Te Waipounamu encourages council to add wording that gives full effect to Te Ture Whenua Māori Act as this will support achieving health equity for Māori. Enabling this rates remission supports the necessary decolonisation required to achieve equitable health outcomes for Māori.

Support changes which give full effect to Te Ture Whenua Māori Act

Revenue and Financing Policy

Submitter Details

Submission Date: 24/04/2024

First name: Hana **Last name:** Wilkinson

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Would you like to present your submission in person at a hearing?

If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please include this information in your submission.

☐ Yes

☒ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

Question 3: Proposal for the Flood Protection rate to be based on land value?

Option one – Use land value as the basis for the rate (Council's proposal)

Comments (optional)?

NPHS Te Waipounamu commends council for basing the Flood Protection Rate on land value as this supports a more equitable payment approach. We recommend this approach based on land value is also applied to Stormwater.

Similarly, NPHS Te Waipounamu supports the option for the New Recovery Rate to also be based on land value. However, we question whether a recovery rate that is planned to cease in ten years is sustainable. This short term, 'one off' type planning contradicts other parts of the LTP which state we expect more natural disasters and intense storm events to come our way in the future (p.g.49 Consultation Document). These events will again, require recovery costs.

NPHS-Te Waipounamu encourages council to add wording that gives full effect to Te Ture Whenua Māori Act. This will ensure that the mana and tino rangatiratanga that Māori exercise over their lands is recognised and provided for and will support achieving health equity for Māori.

Recommend: Stormwater rate is based on land value.

Support: Option to base the New Recovery Rate on land value but recommend council reconsider capturing this cost under general rates as more natural disasters are expected in the next 10 years and beyond.

Support additional wording that gives full effect to Te Ture Whenua Māori Act

Significance and Engagement Policy

Submitter Details

Submission Date: 24/04/2024

First name: Hana **Last name:** Wilkinson

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Would you like to present your submission in person at a hearing?

If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please include this information in your submission.

☐ Yes

☒ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

Significance and Engagement Policy

[Click here to view Policy Information](#)

Do you have any feedback on the proposed Significance and Engagement Policy changes?

NPHS- Te Waipounamu recommends rewording:

4.3 "Council's engagement with Māori and iwi aligns with the Treaty principles of partnership, protection and participation." the articles of Te Tiriti o Waitangi.

Treaty of Waitangi (Te Tiriti o Waitangi*) has the same meaning as the word 'Treaty' as defined in section 2 of the Treaty of Waitangi Act 1975. Section 2 of the Treaty of Waitangi Act 1975 refers to both to 'Te Tiriti o Waitangi' (Te Tiriti) and the 'Treaty of Waitangi' (The Treaty). It is deeply problematic to use the term the Treaty of Waitangi to refer to both Te Tiriti (Māori text) and the Treaty (the English version). These are two separate documents that say two distinct things: acceptance of the Waitangi Tribunal WAI 1040 (ruling that Ngāpuhi never ceded sovereignty) and the legal doctrine of contra proferentem (recognising the preferred authority of the Māori text); or the contrary position embracing the English version which implies that Māori ceded sovereignty.

In addition, the original Wai 2575 Hauora Report of Health Services and Outcomes Kaupapa Inquiry released in 2019 made it clear that the 3P's (partnership, protection and participation) were outdated and recommended new principles: Tino Rangatiratanga, Equity, Active Protection and Options. However, we strongly recommend council refers to the Articles of the Māori text rather than the principles. Implementing the articles of Te Tiriti o Waitangi into this strategy ensures full effect is given to Te Tiriti.

General recommendations:

- That consultation periods are extended beyond four-weeks when they are matters of greater public interest such as Plan Change 29.
- That early engagement is offered where feedback is sought prior to formal consultation. An example of this is TDC offering early engagement last year on this year's Long-Term Plan. This provided greater opportunity for feedback across the two consultation periods, which is helpful when there is a high volume of information being consulted on.
- That assistance to complete submissions by calling the Customer Service Centre is offered for all consultations. It is noted that the following is included in NCC's LTP consultation document. This supports equity and greater community participation.

Current engagement modalities employed by local government (e.g. web-based consultation documents, drop-in workshops) favour individuals with time, literacy skills, access to internet, and confidence to make a submission. Many local government issues such as climate resilience, transport, urban development etc. are specialised areas that are difficult to communicate well to the public – this leads to people with financial or other interests in issues being more likely to submit, and often in favour of status quo options.

We support a move to more innovative community engagement beyond traditional options, where information gathered may better represent the range of voices within a community rather than those that are privileged enough to engage with the current approach.

Recommend the following when engaging the public in consultation:

- Extended consultation periods, early engagement.
- Use social media platforms that will reach the youth population.
- Utilise existing communication streams within schools, businesses and workplaces to advertise consultation opportunities.
- Provide consultation documents in different forms e.g. create short videos summaries of large documents. These would need to appeal to a range of audiences and could include imagery, text and Te Reo Māori and sign language options.
- Consider font size and colour (for people with low vision).
- Offer alternative ways to give feedback e.g. video, audio or pictorial submissions.

Proposed: Commercial Occupation Policy, fees, amendment to Urban Environment Bylaw



Submitter Details

Submission Date: 05/07/2024

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Last name: McCall

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Would you like to present your submission in person at a hearing?

If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please include this information in your submission.

Yes

Additional requirements for hearing:

Feedback

Part A: Proposed Commercial Occupation Policy (footpath and car park dining, street stalls and markets)

Please provide your feedback below

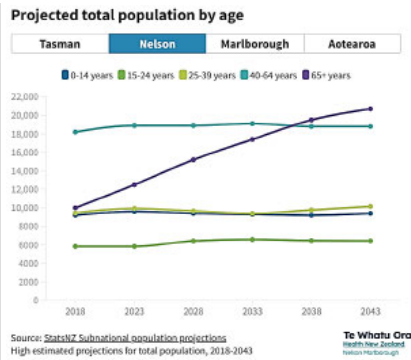
Accessibility and Footpath Width

NPHS Te Waipounamu recommends the proposed unobtrusive footpath width beside

“accessibility” on page 1 is extended from 1.8 metre (m) to 2 m wherever practical. This will retain the current footpath width in the existing Policy for Commercial Occupation of Footpaths, Carparks, and Parking Squares, where 2 m clearance of “at least two-meter width of unrestricted passage” is prescribed (clauses 46 and 84). Retaining the 2 m width will support accessibility for mobility purposes, providing greater comfort for mobility scooters, wheelchairs, pushchairs and people with vision impairments. It will also provide consistency with the 2 m footpath width prescribed in the existing Urban Environments Bylaw (clauses 5.21.3 and 5.24), which we note is proposed to be reduced to 1.8m in the amended bylaw.

Retaining a footpath width of 2 m will be important for future planning, as there are a growing number of older adults and associated accessibility needs in our community. The number of Nelson residents aged 65 and over is projected to more than double and will make up a third of the total Nelson population by 2043. This is depicted in graph 1 below. Given this prediction, we can presume the number of disabled people will significantly increase in this time. It is worth noting that the term disability may include hearing, seeing, mobility, agility, intellectual, psychiatric, learning and memory impairments.

Graph 1: High estimated projections for total population, 2018-2043.



When a 2 m footpath width is not possible, we support “an exemption from this requirement may be made on a case-by-case basis, factoring in the total footpath width, pedestrian numbers, and the speed and number of vehicles using the adjacent road” as outlined on page 3 of the policy.

We note staff originally proposed a 2 m footpath clearance (page 6 of the staff report (R28593)). It is worth considering that some mobility scooters can be up to 1-metre in mirror-to-mirror width.⁵

Environmental considerations

NPHS Te Waipounamu recommends environmental considerations are included under “Specific assessment matters for markets” on page 4 of the policy. For example, coffee carts may have a sign encouraging patrons to bring their own cup or food stalls could provide food waste/compost bins. Encouraging applicants to consider the environmental impact of their stall will support Council’s kaupapa around climate action as outlined in Te Mahere Mahi a te Ahururangi Climate Action Plan.⁶

Suggested clause: “How is the applicant proposing to reduce their carbon footprint, for example, by using sustainable packaged products or sustainable presentation”

Reduced Exposure of Alcohol in Outdoor Dining Environments

Under “Assessment matters for licence applications”, we encourage NCC to consider including a requirement for licensees to reduce exposure of alcohol to children on any adjacent footpath. Alcohol can cause considerable harms to people, whānau and communities and drives health and social inequities, resulting in significant costs to the health, welfare and justice sectors.⁷

Normalisation of alcohol use refers to the widespread availability and social acceptance of alcohol.⁸ Consumption of alcohol in public places such as outdoor dining environments contributes to its normalisation in society. If alcohol consumption is present in outdoor dining environments, it is encouraged that screening/a visual barrier between the licenced area and the pavement is required. This could be in the form of shrubs, fencing, planter boxes etc. We are aware that other mechanisms exist for regulation in this space, such as alcohol licensing

5 <https://nzta.govt.nz/resources/21-06-horizontal-geometric-design-for-mobility-scooters/>

6 <https://www.nelson.govt.nz/assets/Climate-Action-Plan-2021-v4.pdf>

7 Te hīringa hauora-Health Promotion Agency. (2022). Alcohol advertising, promotion and sponsorship. <https://www.hpa.org.nz/sites/default/files/4.0%20AL1195-B%20Advertising%20and%20Promotion%20Position%20Statement.pdf>

8 The unintended normalisation of alcohol: What role does the family play? (n.d.). Positive Choices Drug and Alcohol Information. Retrieved November 30, 2023, from <https://positivechoices.org.au/parents/normalisation-of-alcohol>

and Local Alcohol Policies, but inclusion of reducing exposure of alcohol consumption in this policy will support these and provide an additional lever to minimise alcohol related harms.

Suggested clause: “Alcohol environments: Mechanisms for how licensees will reduce exposure of alcohol to children outside of the licenced area.”

Smokefree/Vapefree (SFVF) Outdoor Dining

We encourage considerations around SFVF outdoor dining environments. As mentioned in our submission to NCC’s 2024-2034 LTP, NPHS Te Waipounamu recommends NCC develops a Smokefree Vapefree Outdoor Policy. We are

aware NCC was working on the development of this policy prior to Covid, and we encourage reestablishing and prioritizing this mahi. Once adopted it would be good to reference it in the Commercial Occupation Policy.

There are growing numbers of councils adopting SFVF policies. In 2022 thirty-one councils across the motu had adopted SFVF policies or had them planned or under review.⁹ Health and environmental considerations supporting smokefree (SF) environments include:

- People who do not smoke and are exposed to secondhand smoke (SHS), even for a short time, can suffer harmful health effects. SHS can cause stroke, cancer and coronary heart disease.¹⁰
- Where free communication exists between outdoor smoking areas and indoor areas, SHS drift can often significantly reduce indoor air quality throughout a pub or bar.¹¹
- Regulations to restrict smoking areas support maintaining air quality and protect human health, particularly workers. ⁴

9

https://www.smokefree.org.nz/sites/default/files/assets/Map%20of%20NZ%20Councils%20Smokefree%20Outdoor%20Policies%20and%20Spaces%20-%20NZ_0.pdf

10 U.S. Department of Health and Human Services. (2014). The Health Consequences of Smoking—50 Years of Progress - A report of the Surgeon General. <https://www.hhs.gov/sites/default/files/consequences-smoking-exec-summary.pdf>

11 National Library of Medicine. (2011). Smoking outdoors at pubs and bars: is it a problem? An air quality study. <https://pubmed.ncbi.nlm.nih.gov/22237565/>

SF community areas provide positive role modelling for tamariki and youth¹² and de-normalises visible smoking in public.¹³

12 Smokefree in your community. (2022, July). Smokefree. <https://www.smokefree.org.nz/smokefree-environments/smokefree-in-your-community>

13 George Thomson, Jennifer Martin, Heather Gifford, Kiri Parata. (2016). Issues and options for progress towards a smokefree city: A case study for smokefree outdoor policies. https://www.otago.ac.nz/_data/assets/pdf_file/0021/228207/short-report-issues-and-options-for-progress-towards-a-smokefree-city-november-2016-621647.pdf

Part C: Proposed amendments to the Urban Environments Bylaw

Please provide your feedback below

Changes to Part Five – Trading in Public Places

Soliciting of donations and selling lottery tickets (clause 5.10)

NPHS Te Waipounamu is broadly supportive of the work that local schools, community groups, registered charities, and not-for profit organisations provide for the community. These organisations offer valuable services for the wider community, including the provision of programmes that enhance health and wellbeing. We are aware of their need to fundraise and support the proposed amendments enabling people on their behalf the ability to solicit donations and other contributions. We are however not supportive of the selling of tickets in a lottery (as defined within the Gambling Act 2003), as these have the potential to encourage gambling habits. Harmful gambling can occur across the spectrum of gambling symptom severity (low risk, moderate risk and problem gambling) and continues to impact all aspects of wellbeing for individuals, their whānau (families) and communities.¹⁴ There are many more gamblers at risk from low-risk harms and so around 50% of all gambling harm occurs in these gamblers.¹⁵ NPHS Te Waipounamu recommends rewording both the title and clause 5.10 to prohibit the selling of lottery tickets.

Suggested title: "Soliciting of donations (clause 5.10)"

Suggested clause: "No person shall occupy any public place for the purpose of soliciting donations, or other contributions, unless the activity is by or on behalf of a local school, community group, or a registered charity, or a

not-for-profit organisation. The selling of tickets in any lottery (as defined in the Gambling Act 2003) are prohibited as a form of soliciting donations."

14 Latvala, T. , Lintonen, T. , & Konu, A. (2019). Public health effects of gambling. Debate on a conceptual model. BMC Public Health , 19(1), 1–16. [PMC free article] [PubMed] [Google Scholar]

15
https://www.health.govt.nz/system/files/documents/publications/measuring_the_burden_of_gambling_harm_in_new_zealand.pdf

Sandwich boards (clause 5.18)

NPHS Te Waipounamu supports the proposed amendments to remove sandwich boards from public places, except to the extent allowed under the NRMP (Nelson Resource Management Plan). It is noted in the staff report (R28593) that complaints have been received by NCC about the number of sandwich boards displayed by businesses and sandwich boards reducing accessibility due to being in the way, or in the wrong location. Footpaths should be inclusive for all, including disabled people and buggies and prams. People who are visually impaired can find the placement of sandwich boards hazardous, particularly if they are placed incorrectly and not meeting the current criteria outlined in the bylaw. As mentioned above, Nelson's aging population is increasing, in turn, it is anticipated people using mobility aids such as walkers, electronic and non-motorised wheelchairs and scooters is likely to increase. Removing sandwich boards will provide consistent footpath width and reduce obstacles to navigate.

Retail displays on footpaths (clause 5.21)

NPHS Te Waipounamu recommends the footpath width described under this section is retained at 2 m (clauses 5.21.3 and 5.24 in the existing bylaw), rather than reduced to 1.8 m for reasons outlined previously.

Activities in Public Places Assessment Matters (clause 6.3)

NPHS Te Waipounamu supports the proposed assessment matters for considering permit applications. It is good to see the criteria addressing matters that can have an impact on public health, such as safety considerations and any noise, odour or other offensive emission from the proposed activity.

Requirements for activities in public places (clause 6.6) (i)

We recommend a footpath width of 2 m is available for pedestrians to pass and repass, rather than 1.8 m for reasons outlined previously.

Schedule A – Prohibition of Alcohol in Public Places

NPHS Te Waipounamu recommends under point 2, the prohibition hours are extended to starting at 7.00 pm instead of 9.00 pm and finishing at 7.00 am as proposed. This is to support areas remaining safe and welcoming environments for families who may still be out beyond 7.00 pm. Starting the prohibition period at 7.00 pm instead of 9.00 pm would be consistent with Tasman District Council's Public Places Bylaw16, where alcohol bans start at 7.00 pm in specified areas including Murchison, Pohara, Motueka, Brightwater and Collingwood to name a few. Suggested wording: "In the following areas the period of prohibition is from 7.00 pm on any day to 7.00 am on the following day".

Any Other Feedback (Optional)

Summary

10. NPHS Te Waipounamu wishes to be heard with respect to this submission.

11. Thank you for the opportunity to submit on the proposed Commercial Occupancy Policy and amended Urban Environments Bylaw. We wish to acknowledge NCC's consultation process and appreciated the opportunity to meet with council staff and ask questions at community drop-in sessions.

Name

NPHS - Te Waipounamu - Commercial Occupation Policy and Urban Environments Bylaw Submission - 4July2024.pdf

4 July 2024

Nelson City Council
110 Trafalgar Street
Nelson 7010

Tena koutou

Submission on the proposed Commercial Occupation Policy and amendments to the Urban Environments Bylaw

1. Thank you for the opportunity to submit on the proposed Commercial Occupation Policy and amendments to the Urban Environments Bylaw. This submission has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand - Te Whatu Ora. NPHS Te Waipounamu services the South Island including Nelson.
2. NPHS recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups, by working together with multiple sectors to address the determinants of health.
4. NPHS is focused on equitable health outcomes. We use the Ministry of Health's definition of equity:

In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.¹

¹ <https://www.tewhatauora.govt.nz/whats-happening/about-us/who-we-are/achieving-equity/>; Accessed 05 Apr 2024

5. This submission responds to some of the proposals provided in the proposed Commercial Occupation Policy and amendments to the Urban Environments Bylaw.
6. This submission also sets out matters of interest and concern to NPHS Te Waipounamu.

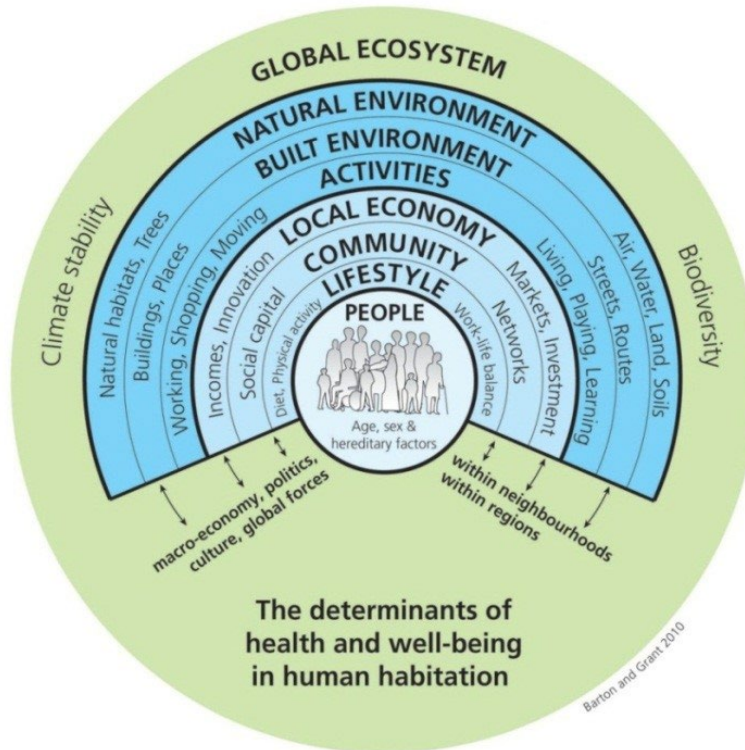
General Comments

7. We welcome the opportunity to comment on the proposed Commercial Occupation Policy and amendments to the Urban Environments Bylaw.
8. Health and wellbeing are influenced by a wide range of factors beyond the health sector. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the social determinants of health.²
9. The diagram³ below shows how these determinants of health are complex and interlinked. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government, if they are to have a collective impact.⁴

² Public Health Advisory Committee. 2004. The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health. Public Health Advisory Committee: Wellington.

³ Barton, H and Grant, M. (2006) A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

⁴ McGinnis JM, Williams-Russo P, Knickman JR. 2002. The case for more active policy attention to health promotion. Health Affairs, 21(2): 78 - 93



Specific Comments

Part A: Proposed Commercial Occupation Policy (footpath and car park dining, street stalls and markets)

Accessibility and Footpath Width

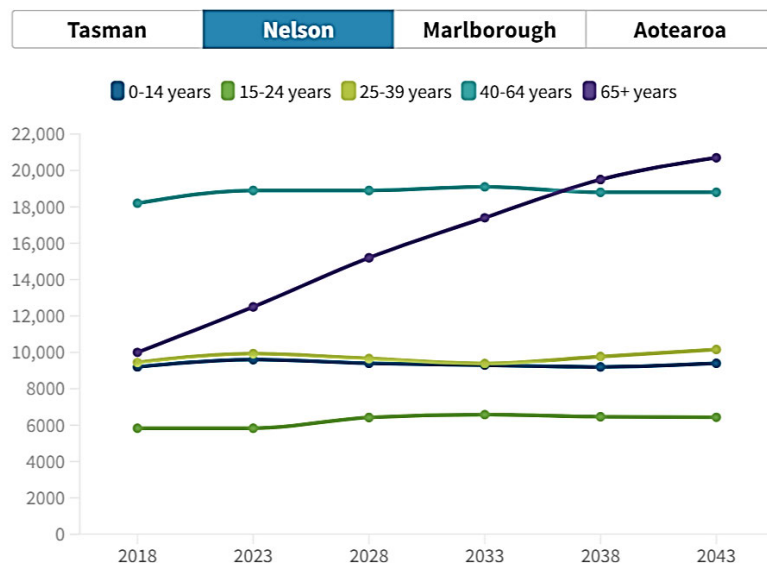
NPHS Te Waipounamu recommends the proposed unobtrusive footpath width beside “accessibility” on page 1 is extended from 1.8 metre (m) to 2 m wherever practical. This will retain the current footpath width in the existing Policy for Commercial Occupation of Footpaths, Carparks, and Parking Squares, where 2 m clearance of “at least two-meter width of unrestricted passage” is prescribed (clauses 46 and 84). Retaining the 2 m width will support accessibility for mobility purposes, providing greater comfort for mobility scooters, wheelchairs, pushchairs and people with vision impairments. It will also provide consistency with the 2 m

footpath width prescribed in the existing Urban Environments Bylaw (clauses 5.21.3 and 5.24), which we note is proposed to be reduced to 1.8m in the amended bylaw.

Retaining a footpath width of 2 m will be important for future planning, as there are a growing number of older adults and associated accessibility needs in our community. The number of Nelson residents aged 65 and over is projected to more than double and will make up a third of the total Nelson population by 2043. This is depicted in graph 1 below. Given this prediction, we can presume the number of disabled people will significantly increase in this time. It is worth noting that the term disability may include hearing, seeing, mobility, agility, intellectual, psychiatric, learning and memory impairments.

Graph 1: High estimated projections for total population, 2018-2043.

Projected total population by age



Source: [StatsNZ Subnational population projections](#)
 High estimated projections for total population, 2018-2043

Te Whatu Ora
 Health New Zealand
 Nelson Marlborough

When a 2 m footpath width is not possible, we support “*an exemption from this requirement may be made on a case-by-case basis, factoring in the total footpath width, pedestrian numbers, and the speed and number of vehicles using the adjacent road*” as outlined on page 3 of the policy.

We note staff originally proposed a 2 m footpath clearance (page 6 of the staff report (R28593)). It is worth considering that some mobility scooters can be up to 1-metre in mirror-to-mirror width.⁵

Environmental considerations

NPHS Te Waipounamu recommends environmental considerations are included under “Specific assessment matters for markets” on page 4 of the policy. For example, coffee carts may have a sign encouraging patrons to bring their own cup or food stalls could provide food waste/compost bins. Encouraging applicants to consider the environmental impact of their stall will support Council’s kaupapa around climate action as outlined in Te Mahere Mahi a te Ahurarangi Climate Action Plan.⁶

Suggested clause: *“How is the applicant proposing to reduce their carbon footprint, for example, by using sustainable packaged products or sustainable presentation”*

Reduced Exposure of Alcohol in Outdoor Dining Environments

Under “Assessment matters for licence applications”, we encourage NCC to consider including a requirement for licensees to reduce exposure of alcohol to children on any adjacent footpath. Alcohol can cause considerable harms to people, whānau and communities and drives health and social inequities, resulting in significant costs to the health, welfare and justice sectors.⁷ Normalisation of alcohol use refers to the widespread availability and social acceptance of alcohol.⁸ Consumption of alcohol in public places such as outdoor dining environments contributes to its normalisation in society. If alcohol consumption is present in outdoor dining environments, it is encouraged that screening/a visual barrier between the licenced area and the pavement is required. This could be in the form of shrubs, fencing, planter boxes etc. We are aware that other mechanisms exist for regulation in this space, such as alcohol licensing

⁵ <https://nzta.govt.nz/resources/21-06-horizontal-geometric-design-for-mobility-scooters/>

⁶ <https://www.nelson.govt.nz/assets/Climate-Action-Plan-2021-v4.pdf>

⁷ Te hiringa hauora-Health Promotion Agency. (2022). Alcohol advertising, promotion and sponsorship. <https://www.hpa.org.nz/sites/default/files/4.0%20AL1195-B%20Advertising%20and%20Promotion%20Position%20Statement.pdf>

⁸ The unintended normalisation of alcohol: What role does the family play? (n.d.). Positive Choices Drug and Alcohol Information. Retrieved November 30, 2023, from <https://positivechoices.org.au/parents/normalisation-of-alcohol>

and Local Alcohol Policies, but inclusion of reducing exposure of alcohol consumption in this policy will support these and provide an additional lever to minimise alcohol related harms.

Suggested clause: ***“Alcohol environments: Mechanisms for how licensees will reduce exposure of alcohol to children outside of the licenced area.”***

Smokefree/Vapefree (SFVF) Outdoor Dining

We encourage considerations around SFVF outdoor dining environments. As mentioned in our submission to NCC’s 2024-2034 LTP, NPHS Te Waipounamu recommends NCC develops a Smokefree Vapefree Outdoor Policy. We are aware NCC was working on the development of this policy prior to Covid, and we encourage reestablishing and prioritizing this mahi. Once adopted it would be good to reference it in the Commercial Occupation Policy.

There are growing numbers of councils adopting SFVF policies. In 2022 thirty-one councils across the motu had adopted SFVF policies or had them planned or under review.⁹ Health and environmental considerations supporting smokefree (SF) environments include:

- People who do not smoke and are exposed to secondhand smoke (SHS), even for a short time, can suffer harmful health effects. SHS can cause stroke, cancer and coronary heart disease.¹⁰
- Where free communication exists between outdoor smoking areas and indoor areas, SHS drift can often significantly reduce indoor air quality throughout a pub or bar.¹¹
- Regulations to restrict smoking areas support maintaining air quality and protect human health, particularly workers.⁴

⁹https://www.smokefree.org.nz/sites/default/files/assets/Map%20of%20NZ%20Councils%20Smokefree%20Outdoor%20Policies%20and%20Spaces%20-%20NZ_0.pdf

¹⁰ U.S. Department of Health and Human Services. (2014). The Health Consequences of Smoking—50 Years of Progress - A report of the Surgeon General. <https://www.hhs.gov/sites/default/files/consequences-smoking-exec-summary.pdf>

¹¹ National Library of Medicine. (2011). Smoking outdoors at pubs and bars: is it a problem? An air quality study. <https://pubmed.ncbi.nlm.nih.gov/22237565/>

- SF community areas provide positive role modelling for tamariki and youth¹² and de-normalises visible smoking in public.¹³

Part C: Proposed amendments to the Urban Environments Bylaw

Changes to Part Five – Trading in Public Places

Soliciting of donations and selling lottery tickets (clause 5.10)

NPHS Te Waipounamu is broadly supportive of the work that local schools, community groups, registered charities, and not-for profit organisations provide for the community. These organisations offer valuable services for the wider community, including the provision of programmes that enhance health and wellbeing. We are aware of their need to fundraise and support the proposed amendments enabling people on their behalf the ability to solicit donations and other contributions. We are however not supportive of the selling of tickets in a lottery (as defined within the Gambling Act 2003), as these have the potential to encourage gambling habits. Harmful gambling can occur across the spectrum of gambling symptom severity (low risk, moderate risk and problem gambling) and continues to impact all aspects of wellbeing for individuals, their whānau (families) and communities.¹⁴ There are many more gamblers at risk from low-risk harms and so around 50% of all gambling harm occurs in these gamblers.¹⁵ NPHS Te Waipounamu recommends rewording both the title and clause 5.10 to prohibit the selling of lottery tickets.

Suggested title: *“Soliciting of donations ~~and selling lottery tickets~~ (clause 5.10)”*

Suggested clause: *“No person shall occupy any public place for the purpose of soliciting donations, or other contributions, ~~or selling tickets in any lottery (as defined within the Gambling~~*

¹² Smokefree in your community. (2022, July). Smokefree. <https://www.smokefree.org.nz/smokefree-environments/smokefree-in-your-community>

¹³ George Thomson, Jennifer Martin, Heather Gifford, Kiri Parata. (2016). Issues and options for progress towards a smokefree city: A case study for smokefree outdoor policies. https://www.otago.ac.nz/__data/assets/pdf_file/0021/228207/short-report-issues-and-options-for-progress-towards-a-smokefree-city-november-2016-621647.pdf

¹⁴ Latvala, T. , Lintonen, T. , & Konu, A. (2019). Public health effects of gambling. Debate on a conceptual model. BMC Public Health , 19(1), 1–16. [PMC free article] [PubMed] [Google Scholar]

¹⁵https://www.health.govt.nz/system/files/documents/publications/measuring_the_burden_of_gambling_harm_in_new_zealand.pdf

Act 2003), unless the activity is by or on behalf of a local school, community group, or a registered charity, or a not-for-profit organisation. The selling of tickets in any lottery (as defined in the Gambling Act 2003) are prohibited as a form of soliciting donations.”

Sandwich boards (clause 5.18)

NPHS Te Waipounamu supports the proposed amendments to remove sandwich boards from public places, except to the extent allowed under the NRMP (Nelson Resource Management Plan). It is noted in the staff report (R28593) that complaints have been received by NCC about the number of sandwich boards displayed by businesses and sandwich boards reducing accessibility due to being in the way, or in the wrong location. Footpaths should be inclusive for all, including disabled people and buggies and prams. People who are visually impaired can find the placement of sandwich boards hazardous, particularly if they are placed incorrectly and not meeting the current criteria outlined in the bylaw. As mentioned above, Nelson’s aging population is increasing, in turn, it is anticipated people using mobility aids such as walkers, electronic and non-motorised wheelchairs and scooters is likely to increase. Removing sandwich boards will provide consistent footpath width and reduce obstacles to navigate.

Retail displays on footpaths (clause 5.21)

NPHS Te Waipounamu recommends the footpath width described under this section is retained at 2 m (clauses 5.21.3 and 5.24 in the existing bylaw), rather than reduced to 1.8 m for reasons outlined previously.

Activities in Public Places Assessment Matters (clause 6.3)

NPHS Te Waipounamu supports the proposed assessment matters for considering permit applications. It is good to see the criteria addressing matters that can have an impact on public health, such as safety considerations and any noise, odour or other offensive emission from the proposed activity.

Requirements for activities in public places (clause 6.6) (i)

We recommend a footpath width of 2 m is available for pedestrians to pass and repass, rather than 1.8 m for reasons outlined previously.

Schedule A – Prohibition of Alcohol in Public Places

NPHS Te Waipounamu recommends under point 2, the prohibition hours are extended to starting at 7.00 pm instead of 9.00 pm and finishing at 7.00 am as proposed. This is to support areas remaining safe and welcoming environments for families who may still be out beyond 7.00 pm. Starting the prohibition period at 7.00 pm instead of 9.00 pm would be consistent with Tasman District Council's Public Places Bylaw¹⁶, where alcohol bans start at 7.00 pm in specified areas including Murchison, Pohara, Motueka, Brightwater and Collingwood to name a few.

Suggested wording: *"In the following areas the period of prohibition is from ~~9.00~~ 7.00 pm on any day to 7.00 am on the following day"*.

Summary

10.NPHS Te Waipounamu wishes to be heard with respect to this submission.

11.Thank you for the opportunity to submit on the proposed Commercial Occupancy Policy and amended Urban Environments Bylaw. We wish to acknowledge NCC's consultation process and appreciated the opportunity to meet with council staff and ask questions at community drop-in sessions.

Ngā mihi,



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NPHS Te Waipounamu Region

¹⁶ Alcohol in Public Places. (2018). Tasman District Council. <https://www.tasman.govt.nz/my-council/key-documents/more/bylaws-and-regulations/consolidated-bylaw/#e571>

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NPHS Te Waipounamu

LGOIMA s7(2)(a)

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Te Kāwanatanga o Aotearoa
New Zealand Government