

Ministry for the Environment
National Planning
Standards

17 August 2018

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

Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu o Te Waka a Maui. NMH appreciates the opportunity to comment from a public health perspective on *National Planning Standards*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General Comments

3. NMH strongly supports the introduction of the National Planning Standards as these will make future resource management plans easier to use for plan writers and plan users. The proposed templates allow for greater consistency which makes them more user friendly and easier to navigate. Set definitions will also provide uniformity across the country which will make it simpler for users, such as the likes of district health boards, who work across numerous councils.
4. NMH supports the inclusion of noise standards within the National Planning templates as this gives consistency and robustness to environmental noise regulations nationally. This inclusion may lead to improved health outcomes related to the minimisation of nuisance effect of noise.

Specific Comments

5. *Question 4 & 5 District Plan Structure Standard*: NMH notes that Noise and Light have been grouped into the same section however as these matters have different measurement and assessment methods, it is more appropriate to have these in separate sections in order to have clarity and reduce confusion.
6. *Question 6 Standard Set of Zones*: NMH supports the inclusion of a standard set of zones as this makes it easier for plan users to navigate between different plans.
7. *Question 9 Zone Purpose Statements*: NMH supports the inclusion of a Hospital zone but recommends that the purpose of this definition be altered slightly to the following:

“The purpose of the Hospital zone is to provide primarily for the ongoing operation of a locally or regionally important ~~primary~~ medical, surgical or psychiatric care facility, and associated health care services and healthcare facilities”

The term *primary* in this sentence refers to the hospital being the main medical facility. However, within the health sector, the term *primary* is used to describe health services that occur in the community outside of the hospital setting e.g. general practices. Therefore it would more appropriate to remove the word *primary* from the sentence to remove confusion.

In addition, the term medical can be seen to be exclusive of surgical procedures or psychiatric care within the health sector. Therefore NMH recommends that the definition is broadened to encapsulate these services.

8. *Question 18 Definitions:* NMH supports the National Planning definitions given for aquifer, ground water and bore as these broadly align with the *Drinking Water Standards for New Zealand 2005 (Revised 2008)*. In addition, NMH supports the definitions given for sewage, greywater and waste water
9. NMH recommends that the definition of drinking water is altered as follows:
 - a) *means water ~~intended~~ to be used for human consumption; and*
 - b) *includes water ~~intended~~ to be used for food preparation, utensil washing, and oral or other personal hygiene.*

This will ensure that the definition is more in line with that of the Health Act. NMH understands that the *NES for Sources of Human Drinking Water* is also under review and therefore recommends this change occurs in both documents.

10. *Question 20 Use of NZ Noise Standards:* NMH agrees that it is appropriate to use NZ Standards as the basis for noise metric and vibration standards. NMH recommends that the National Planning Standards are edited to ensure consistency with the New Zealand Standards. Within the National Planning Standard, it is recommended that a standard format for district/region wide noise rules is developed.

Conclusion

11. NMH thanks the Ministry for the Environment for the opportunity to comment on *National Planning Standards*.

Yours sincerely

Peter Bramley
Chief Executive
Peter.bramley@nmdhb.govt.nz