

# **Nelson City Council**

## **Draft Nelson Plan Consultation**

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## Submitter details

- Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Nelson City Council's Draft Nelson Plan consultation.
- NMH makes this submission in recognition of:
  - a. its functions and responsibilities in funding and providing health services to the public, such as the Nelson Hospital and community support services (e.g. for disabilities, mental health), under the Health and Disabilities Services (Safety) Act 2001
  - b. its public health responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956
  - c. other healthcare services and facilities outside those administered by NMH but which contribute to the efficiency and effectiveness of the public health system as a whole, including those associated with emergency services, general practices, and community support services.
- NMH also makes this submission from a Health in All Policies (HiAP) perspective. HiAP is defined as "an approach to public policies across sectors that systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts, in order to improve population health and health equity." It emphasises that local and national government objectives are best achieved when all sectors include health and wellbeing as a key component of policy development. For example, good health enhances quality of life, improves workforce productivity, increases the capacity for learning, strengthens families and communities, supports sustainable habitats and environments, and contributes to security, poverty reduction and social inclusion.
- NMH considers that HiAP recognises the parallels between the roles of the public health and local government sectors in contributing towards the shared goal of promoting and protecting community wellbeing. For example, HiAP assists Nelson City Council's (NCC) role under the Resource Management Act 1991 (RMA) of sustainably managing natural and physical resources in way that "enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety" and ensuring that any adverse effects of activities on the environment (including effects on people and communities) are avoided,

remedied or mitigated. It also underpins NMH's role in improving, promoting and protecting the health of people and communities as identified above.

- To elaborate further, health starts – long before we see a doctor – in our families and homes, in our schools and workplaces, in our playgrounds and parks, and in the air we breathe and water we drink. Therefore, in order to maintain or improve community health and wellbeing attention must be focused on the social, cultural, economic and environmental factors that protect and promote good health. These factors are known as the determinants of health and more often than not have a greater bearing on the health of communities and individuals than access or use of healthcare services.
- Local authority plans prepared under the RMA have a significant influence on shaping the environments that we live in and accordingly affect the determinants of health. Examples where the provisions of plans can have an influence on public health and wellbeing outcomes include urban design (e.g. subdivision and housing requirements, transport, opportunities for physical activity) and the sustainable management of life supporting resources (e.g. soil, air and water quality).
- NMH supports the Strategic Outcomes of the Nelson Plan which support good environmental and health outcomes for Nelson including:
  - a. Our natural environment is kept well and strong
  - b. Whakatū Nelson is business –friendly and business is sensitive to the environment
  - c. Create a vibrant, attractive, connected, and well-planned city that is engage in climate change mitigation, adaption, innovation and resilience
  - d. Our City Centre is attractive to businesses, residents and visitors
  - e. Residential areas provide for a broad range of affordable housing types
  - f. Industrial areas provide for appropriate local and economic development
  - g. Essential infrastructure future proofs our city
  - h. We will adapt to our natural hazard risks
  - i. Natural and heritage values are protected and celebrated
  - j. Rural values are maintained and enhanced
  - k. Coastal and marine areas are health and productive
  - l. Whakatū Nelson has clean and accessible water

m. Whakatū Nelson has clean air.

- This submission sets out particular matters of interest or concern to NMH in regards to public health and healthcare services and facilities.

### **Specific Comments**

- The following table sets out NMH's specific comments and recommended amendments to the content and provisions of the Draft Nelson Plan in order to better provide for the health and wellbeing of people and communities, and the healthcare services and facilities that serve the people of Nelson. Where specific amendments are recommended to strengthen or improve draft provisions, suggested additions are shown as bold font and deletions are shown with a strikethrough.

Definitions		
Area matters relate to	Comments/Explanation	Recommendations
Part one: DEF Contaminated Land	<b>Support in part:</b> NMH notes that this definition is based on the RMA definition however NMH would like to see this definition having a human health component	<b>Amend</b> as follows: <i>Means land that has a hazardous substance in or on it that:</i> 1. <i>has significant adverse effects on <b>human health and</b> the environment; or</i> 2. <i>is reasonably likely to have significant adverse effects on <b>human health and</b> the environment.</i>
Part one: DEF Domestic wastewater system	<b>Support in part:</b> NMH supports the intentions of this definition however it might be beneficial for the reader to add a reference to “domestic/dwelling”	<b>Amend</b> as follows: <i>Means the pipes, tanks, equipment and facilities used within a <b>domestic dwelling</b> site to collect, store, treat and dispose of wastewater generated only by activities within the site.</i>
Part one: Drinking water (new)	NMH notes that term Drinking water is not defined in the plan. NMH recommends that the definition for drinking water is taken from the Ministry of Health’s <i>New Zealand Drinking Water Standards</i> . NMH recommends that the term potable water is not used within the document as this is a more technical term as defined in the Ministry Standard.	<b>Add</b> a new definition for Drinking Water: <i>Water intended to be used for human consumption, food preparation, utensil washing, oral hygiene or personal hygiene.</i>
Part one: DEF Flood tolerant activities	<b>Support in part:</b> This definition does not clearly define what a flood tolerant activity is. NMH recommends that this definition is added.	<b>Amend</b> the definition of the term “flood tolerant activities”
Part one: DEF Forested catchment	<b>Support in part:</b> Given that this definition relates to LF-R37 <i>Activity on or over the bed of a surface water body</i> , it would be beneficial that the definition specifies <i>plantation</i> forested catchment to distinguish it from <i>native</i> forestry – if that is what is meant.	<b>Add</b> clarification on the type of forested catchment
Part one: DEF Hazardous facility	<b>Support in part:</b> This definition talks about <i>activities</i> and facilities. NMH recommends that the title is changed to reflect both for clarity.	<b>Amend</b> Hazardous facility to Hazardous facility <b>and activity</b>
Part one: DEF Intensive farming	<b>Support in part:</b> The definition seems to exclude dairying which, depending on the circumstances, could be regarded as intensive	<b>Amend</b> definition to include dairy farming

Part one: DEF Wastewater	<b>Oppose:</b> It is unclear why wastewater has been defined as being a combination of sewage, greywater, industrial and trade waste. NMH recommends that this definition is more clearly defined	<b>Amend</b> the definition of the term Wastewater
Part one: DEF Well	<b>Support in part:</b> NMH notes there is a word missing in the following sentence. NMH recommends this is amended as follows: But it ( <b>excludes</b> ) test pits, trenches, soak holes and soakage pits.	<b>Amend:</b> Has the same meaning as bore: Means any hole drilled or constructed in the ground that is used to: 1. investigate or monitor conditions below the ground surface; or 2. abstract gaseous or liquid substances from the ground; or 3. discharge gaseous or liquid substances into the ground. But it <b>excludes</b> test pits, trenches, soak holes and soakage pits.

Air		
Part 2 / Part 3 16/29 Air	NMH will review the Air chapter once the chapter is released	

Climate Change		
Area matters relate to	Comments/Explanation	Recommendations
Part 2 17 Climate Change	<b>Support:</b> NMH is supportive of the extent and the breadth of the chapter on climate change. NCC have outlined succinctly the issues, objectives, policies and methods relating to climate change. The proposed chapter recognises the need for flexibility to enable the Council and the community to adapt change conditions over time as a result of climate change.	<b>Support</b>

<p>Part 2 –17 Climate Change SRM-CC-I1 SRMR-CC-01 Responding to the effects of climate change SRMR-CC-02 Reduce carbon emissions</p>	<p><b>Support in part:</b> WHO has identified the overall health effects of a changing climate as overwhelmingly negative<sup>1</sup>. Extreme high air temperatures contribute directly to deaths from cardiovascular and respiratory disease, particularly among elderly people. Pollen and other aeroallergen levels are also higher in extreme heat. These can trigger asthma, 10.5% of the Nelson Marlborough population already has asthma.<sup>2</sup> The explanation of Climate change should be expanded to recognise the potential effects on the Nelson community’s physical and mental health and wellbeing. NMH support the Objectives in relation to climate change.</p>	<p><b>Amend SMRC CC-I1</b> so that the potential effects on the Nelson community’s physical and mental health and wellbeing are better recognised.</p>
<p>SRMR-CC-M2 [RPS] Non-regulatory plans/strategies</p>	<p><b>Support:</b> NMH strongly supports NCC assessing and addressing the carbon footprint of its own activities and encouraging other businesses to do likewise. In giving effect to this, NMH recommends that NCC records and reports on its carbon emissions and encourages other local businesses and organisations to do the same. Current council activities which go towards lowering carbon emissions, such as introducing electric vehicles to the Council fleet, and programmes to reduce the volume of organic waste going to landfill and NCC’s role in planting trees, should also be recognised.</p>	<p><b>Add a requirement to SMRC-CC-M2</b> - That NCC will record and report on the carbon emissions of its own activities and encourage other local businesses and organisations to do the same.</p>
<p>SRMR-CC-M4 [RPS] Advocacy and education</p>	<p><b>Support in part:</b> NMH supports this provision regarding sharing the findings of research on climate change on resources but would like to recommend that an additional provision is added regarding the effects of climate change on the Nelson community’s health and wellbeing. The National Climate Change Risk Assessment for New Zealand details risks to mental health, identity, autonomy and sense of belonging and wellbeing from trauma due to ongoing sea-level rise, extreme weather events and drought. NMH, NCC and other key agencies need to work together to look at the local effects on the region. NMH is happy to partner with NCC on this work.</p>	<p><b>Add</b> an additional provision to SRMR-CC-M4 [RPS] <i>Share the findings of research on climate change and potential effects of climate change on the local community’s health and wellbeing</i></p>

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

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

SRMR-ECO-M9 [RPS] Partnerships	<b>Support:</b> NMH supports this and would propose it to be expanded to include our organisation. Noting the effects of climate change on health, NMH would like the opportunity to be involved in infrastructure decision making processes.	<b>Amend</b> SRMR-ECO-M9 to: <i>Council, <u>Nelson Marlborough Health</u>, government departments, business, owners</i>
Climate Change provision - general	NMH notes that this Climate Change chapter is high level and many of the specific issues in relation to taking cognizance of climate change in the development of infrastructure are covered in rules and policies elsewhere in the plan. It would be beneficial to have links made with corresponding sections to it is more explicit to the reader that work is occurring in a multitude of sections	<b>Add</b> links between the Climate Change chapter and climate change provisions in the Plan

Contaminated Land		
Area matters relate to	Comments/Explanation	Recommendations
Part 2 SMR-HAZ-I5 / SRMR-HAZ-O2 / SRMR-HAZ-P9 Soil contamination SRMR-HAZ-P10 Further soil contamination CON-O1 Management and remediation of contaminated land CON-P1-P3 Contaminated Land	<b>Support in part:</b>  NMH supports NCC's approach to use the National Environment Standard for Assessment and Managing Containments in Soil to Protect Human Health as the primary management method and there is no need to add further requirements or processes.  NMH supports the objectives and policies in relation to preventing soil contamination and ensuring that historic soil contamination is remediated. It is important to note that the remediation land may not result in the land being returned to its pre-contaminated state. Therefore NMH recommends that this is recognised in the Issues section in Part two.	<b>Amend</b> SRMR_HAZ-I5 to <i>Remediation of contaminated land is necessary to avoid potentially adverse environmental and human health effects, and to make best use of zoned urban land. <u>However remediation may not result in the land being returned to its pre-contaminated state and the use of the land may be restricted.</u></i>



Natural Hazards		
Area matters relate to	Comments/Explanation	Recommendations
Part 2 21 Hazard and risks SRMR-HAZ-O1 Natural hazards [RPS] SRMR-HAZ-P3 Significant risk areas SRMR-HAZ-P4 All other areas risk areas SRMR-HAZ-P6 Regionally significant infrastructure SRMR-HAZ-P8 Public awareness	<b>Support:</b> NMH supports the objectives and policies in relation to managing the risk to Whakatū Nelson people from natural hazards	<b>Support</b>
SRMR-HAZ-M4 [RPS]	<b>Support:</b> Support the prepare and implement a strategic framework and action plan(s) to address risks associated with natural hazard and to adapt to the effects of climate change	<b>Support</b>
SRMR-HAZ-M20 [RPS]	<b>Support:</b> Support the provision of non-regulatory programme funding (such as Nelson Nature and the Climate Forum) to assist biodiversity and communities to adapt in the face of potential climate change impacts.	<b>Support</b>

Hazardous Substances		
Area matters relate to	Comments/Explanation	Recommendations
Part 3 HAZS-O1 Benefits and risks of hazardous substances HAZS-P1-3 Managing hazardous substances	<b>Support:</b> NMH supports the objectives and policies in relation to managing the risks of hazardous substances to human health.  NMH supports the approach taken within this chapter in removing duplication by using the Hazardous Substances and New Organisms Act as the base document.	<b>Support</b>

Freshwater		
Area matters relate to	Comments/Explanation	Recommendations
Part 2 23 Land and Freshwater	<p><b>Support</b> NMH acknowledges that this section may be further revised to reflect the “Action for Healthy Waterways Package.</p> <p>NMH agree that NCC has captured the issues relating to land and water accurately especially in regards to soil erosion, degraded water quality, and climate change</p>	<b>Support</b>
Part 2 and Part 3 SRMR-LF-O2/ SRMR-LF-P2 Maintenance of freshwater values SRMR-LF-O3 Use and development of freshwater SRMR-LF-O5 Acknowledgement, protection and restoration of freshwater values LF-O1 Integrated land and freshwater management LF-O2 Restoration of degraded freshwater bodies LF-O3 Water allocation limits LF-O7 Management of natural wetlands SRMR-LF-P1 Sustainable land management SRMR-LF-P3 Improving degraded freshwater to support freshwater values SRMR-LF-P4 Freshwater abstraction SRMR-LF-P5 Integrated management of surface water and groundwater resources	<p><b>Support:</b> NMH supports the objectives and policies in relation to maintaining, protecting and restoring freshwater. NMH agrees that freshwater values need to be protected from inappropriate use and development and those water bodies that have degraded water quality need to be restored.</p> <p>In addition NMH supports integrated management of surface and groundwater resources.</p> <p>NMH supports objectives and policies that promote land management that minimises nutrient loss, and does not accelerate soil erosion.</p> <p>NMH also supports the management of flood hazards within the natural character of the river.</p>	<b>Support</b>

<p>LF-P3 Catchment land management</p> <p>LF-P5 Maintenance enhancement of riparian values</p> <p>SRMR-LF-P6 Efficient end use of abstracted freshwater</p> <p>SRMR-LF-P8 Protection of freshwater values</p> <p>SRMR-LF-P12 Flood hazard management</p> <p>LF-P10 Point source discharges to land</p> <p>LF-P11-13 Discharges to land</p> <p>LF-P14 Permitted freshwater abstraction</p> <p>LF-P20 Abstraction below minimum flow for essential needs only</p>		
<p>LF-O4 Primary contact water quality standards</p>	<p><b>Support:</b> NMH supports the standards and timeframes for improving water quality in surface water bodies used for primary contact, especially for Band A/B where water quality needs to be maintained or improved; Band C water is improved to Band B standards by 2030; Band D water is improved to Band C was by 2030 and then to Band B standards by 2040.</p>	<p><b>Support</b></p>
<p>LF-O5 Beneficial use of freshwater</p>	<p><b>Support in part:</b> NMH supports the intention of this objective and notes that this objective focuses on provision of <i>economic</i> wellbeing rather than overall wellbeing. NMH recommends that this objective is broadened to overall wellbeing as this is in keeping with the intention of <i>Te Mana o te Wai</i>. NMH notes the NCC commitment to “<i>Tūpuna Pono, Being Good Ancestors</i>”, the Te Taihū Intergenerational Strategy. This strategy has an action on improving water stewardship.</p>	<p><b>Amend LF-O5 to Freshwater that is available for use, is used efficiently, and its quantity and quality meet the community’s needs and provide for <i>economic</i> well-being,:</b></p>
<p>LF-P16 Protection of community water supply sources</p>	<p><b>Support in part:</b> NCC should be aware that the new Water Services Bill when enacted tis likely to include catchment risk management plans and the Water</p>	<p><b>Add LF-P16</b></p>

	<p>Safety Planning Framework 2018 places a strong emphasis on drinking water source protection therefore we would like this recognised within the revised Chapter.</p> <p>We recognise that there is increasing pressure to develop these areas for recreational uses however a balance must be struck between development and the primary function of these catchments as sources for Nelson City’s drinking water.</p>	<p><a href="#">4. Minimising development within these catchment that has the potential to degrade the drinking water source quality</a></p>
LF-P17 Freshwater allocation limits	<p><b>Support in part:</b> NMH is in support but notes that these provisions give equal ratings on all community needs for water. NMH would like to see that water associated with public health needs of the community is given priority.</p>	<p><b>Amend LF-P17 as follows:</b></p> <ol style="list-style-type: none"> <li>1. the intended use of the water is an efficient use of water, having regard to the volume of water available to meet the <del>reasonably foreseeable sanitation and drinking water</del> needs of the Whakatū Nelson community; and</li> <li>2. the intended use of the water is an efficient use of water, having regard to the volume of water available to meet the reasonably foreseeable needs of the Whakatū Nelson community...</li> </ol>
LF-P25 Rainwater harvesting	<p><b>Support in part:</b> NMH notes the importance of rainwater harvesting as the population grows and there are more frequent droughts as a result of climate change. NMH supports the use of rainwater for gardening, cleaning or toilet/laundry purposes. NMH does not support the use of rainwater for drinking water purposes unless there are no alternative reticulated option and <i>only</i> where suitable treatment is in place to render the water potable. NMH would like to see more explicit direction in the Plan of when rainwater harvesting can be used.</p> <p>Consideration could be given to using the term “Rainwater Collection” rather than “Rainwater Harvesting” as the term “harvesting” could imply “exploitation” to some people and this is not in the spirit of Te Mana o Te Wai.</p>	<p><b>Amend LF-P25 as follows:</b></p> <p><i>Require the harvesting and storage of rainwater <b>for non-drinking water uses</b>, to minimise abstraction of freshwater where reticulated water supply is not available and elsewhere encourage the harvesting and storage of rainwater.</i></p>
LF-P26 Freshwater harvesting for off-line storage	<p><b>Support in part:</b> As above, NMH only supports the use of this water for non-drinking water uses.</p>	<p><b>Amend LF-P25 as follows:</b></p>

		<i>Enable the harvesting and storage of freshwater <b>for non-drinking water uses</b> for off-line storage ...</i>
LF-P27 Re-use and recycling of freshwater	<b>Support in part:</b> Water is a precious resource that needs to be safeguarded. NMH supports the intent of this policy but it is disappointed to see that there is no provision within this policy around ensuring that this water is safe to use. This is a major omission. NMH recommends that the policy is updated to reflect safety.	<b>Amend LF-P27</b> Re-use and recycling of freshwater <i>Encourage the <b>safe</b> re-use and recycling of freshwater and wastewater where this can reduce the need for abstraction of freshwater</i>
LF-28 Connection required to community water supply network where available	<b>Support:</b> NMH supports this policy in its entirety	<b>Support</b>
LF-P29 Demand management and water conservation / LF-P30 Sustaining groundwater resources/ LF-P31 Managing connected groundwater and surface water resources/LF-P32 Groundwater bore construction	<b>Support:</b> NMH supports these policies in their entirety	<b>Support</b>
LF-P33 Protecting groundwater resources from containment / LF-P34 Avoiding adverse effects of contaminate discharges to surface water	<b>Support:</b> NMH supports these policies in their entirety	<b>Support</b>
LF-P35 Point source discharges of untreated wastewater // LF-P36 Community wastewater network operational requirements	<b>Support in part:</b> NMH would like this policy to be reworded to reflect that discharge would only occur in an unavoidable emergency situation such as a significant infrastructure failure.	<b>Amend LF-P35:</b> <i>the discharge is demonstrated to be the best practicable option in an unavoidable emergency situation necessary to enable the functioning of a community wastewater network;</i>  <b>Amend LF-P36:</b> <i>Require community wastewater networks to be designed and operated to avoid overflows that discharge, either directly or via stormwater flows,</i>

		<i>to surface water, except where such overflow discharges are demonstrated to be the best practicable option in an unavoidable emergency situation ...</i>
LF-P37 Wastewater overflows/ LF-P38 Peak wet weather wastewater flows	<b>Support:</b> NMH supports these policies in their entirety	<b>Support</b>
LF-P39 Preferential discharge to land / LF-P40 Point source discharge to surface water	<b>Support:</b> NMH supports these policies in their entirety	<b>Support</b>
LF-P39 Preferential discharge to land / LF-P40 Point source discharge to surface water	<b>Support:</b> NMH supports these policies in their entirety	<b>Support</b>
LF-P47 On site rainwater storage.	<b>Support in part:</b> NMH notes the importance of rainwater harvesting as the population grows and there are more frequent droughts as a result of climate change. NMH supports the use of rainwater for gardening, car cleaning or toilet/laundry purposes. NMH does not support the use of rainwater for potable purposes (e.g. drinking and bathing). NMH would like to see more explicit direction in the Plan of when rainwater harvesting can be used.	<b>Amend LF-P47 as follows:</b> <i>Encourage on-site storage of rainfall to detain peak stormwater flows, minimise stormwater discharges, reduce contaminant concentrations, and provide supplementary <u>non-drinking</u> water supply.</i>
Rules package LF-R1-R73	NMH has reviewed the entire rules package and supports them in their entirety	<b>Support</b>

Activities on the surface of water		
Area matters relate to	Comments/Explanation	Recommendations
Part 3 ASW-01 Maintenance of freshwater values	<b>Support.</b> NMH support the objectives that maintain the freshwater values identified in APP28	<b>Support</b>

ASW-P1 Providing for activities on the surfaces of freshwater bodies	<b>Oppose:</b> NMH does not support this policy because the phrasing of the policy implies that activities on the surface of water are allowed if they cause adverse effects. This contradicts the above objective and will not seek the outcomes that the Council wants to achieve	<b>Amend ASW-P1 to</b> <i>Provide for activities on the surface of water... <del>that have adverse effects</del> that are consistent with the values identified....</i>
ASW-R2 Activity on the surface of water	<b>Oppose:</b> NMH notes this section applies to any surface water body in the region. NMH supports this intention but would like to see the Maitai Dam be excluded from this provision. As the water in the Maitai Dam is essential for drinking water, it is important that the water is kept as pristine as possible therefore NMH recommends that the use of non-motorised and motorised water craft in the Maitai Dam is not permitted unless the use of water craft is used solely for scientific purposes.	<b>Amend:</b> NMH recommends that the following wording is amended in ASW-R2 as follows:  1. The use of nonmotorised and motorised water craft for recreational, educational or scientific purposes on the surface of any surface water body <u>[excluding the Maitai Dam]</u> , is a permitted activity, provided that...  <i>The use of nonmotorised and motorised water craft <del>for recreational, educational or</del> for scientific purposes on the surface of <u>the Maitai Dam</u> is a permitted activity, provided that ...</i>  2. The use of nonmotorised water craft for a commercial recreational purpose on the surface of any surface water body <u>[excluding the Maitai Dam]</u> , is a controlled activity...  3. The use of motorised water craft for a recreational purpose on the surface of any surface water body <u>[excluding the Maitai Dam]</u> , is a discretionary activity.
Part 6 LF APP28 Freshwater values by FMU	<b>Support in part:</b> NMH supports this section but would like to see one amendment that the tick is removed from the Lower Brook Row in regards to Community Water Supply as this is incorrect.	<b>Amend:</b> the tick is removed from the Lower Brook Row in regards to Community Water Supply
Part 6 LF APP30 Maitai Reservoir water quality limits	<b>Support in part:</b> There is no threshold/target number of E. coli for sources of drinking water, such as the Maitai Reservoir, as there is for recreational water so these E. coli/100ml scoring is not applicable to the drinking water context.	<b>Amend APP30 as follows:</b> The E. coli/100ml rating of >260 is deleted and <u>Not applicable</u> is added.

Part 6 LF APP33 Water quality limits	<b>Support in part:</b> Where a water way is only used of recreation/ecosystem health and not drinking water, these parameters can stay as they are. There is no threshold/target number of E. coli for sources of drinking water, as there is for recreational water so Column relating to E. coli/100ml are not applicable to the drinking water context and therefore should be amended to Not Applicable	<b>Amend</b> APP33 as follows: In relation to freshwater management units used for Drinking water, the E. coli/100ml rating of >260 is deleted and <u>Not applicable</u> is added.
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Marine Water Standards		
Area matters relate to	Comments/Explanation	Recommendations
Part 6 CMA – Coastal marine area APP14 – Marine water quality standards	<b>Support in part:</b> In addition to the current level of 140 Enterococci/100mL, the Ministry for the Environment’s “ <i>Microbial Water Quality Guidelines for Marine and Freshwater</i> ” also allow for samples up to 280 Enterococci/100mL. NMH would like clarity on whether NCC will only use this one standard [140 Enterococci/100mL] as a goal or also take into consideration the second standard.  Cultural Values. Paragraph 3: It needs to be clear that the microbial standard relates to shellfish growing water quality and not recreational water which has different standard, as set out above.	<b>Amend</b> APP14 to align with the current (or subsequent editions) Ministry for the Environment’s “ <i>Microbial Water Quality Guidelines for Marine and Freshwater</i> ”. This recognises both standards.

Noise		
Area matters relate to	Comments/Explanation	Recommendations
Part 3 Noise-R5-R9, R12, R16, R23, R26, R27 sections 50, 110 and 111	<b>Oppose.</b> The provisions do not adequately control environmental noise affecting public health. The NOISE section is difficult to follow with a complex structure. This appears to arise from inadequate translation and restructuring of existing distributed noise provisions in the operative plan to a single district-wide chapter in the draft plan. While the National Planning Standards have required format/structural changes, this appears to have resulted in conflicting/duplicate structures within the draft plan. It is	<b>Amend as follows:</b>  NOISE-R5 – the baseline for permitted changes (and sequential changes) is not specified and is therefore ambiguous and probably unenforceable.  NOISE-R6 – noise limits should be in a district-wide table



recommended that the NOISE section be comprehensively redrafted and simplified to better follow the National Planning Standards.

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

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

NOISE-R6 – the LAFmax limit is not adequate to protect sleep without also setting an LAeq limit (other than for new properties that may have been appropriately insulated/mechanically ventilated)

NOISE-R7 – the ventilation requirements are ambiguous: “...has either ventilating windows open or minimum ventilation requirements as set down in...”

NOISE-R8 – noise limits should be in a district-wide table

NOISE-R9 – noise limits should be in a district-wide table

NOISE-R12 – noise limits should be in a district-wide table

NOISE-R12 – the specified limits are incompatible with residential activity and exceed guideline values in NZS 6802 by 10dB; these specified limits do not protect public health

NOISE-R12 – the exceptions should be addressed in the overall structure of the rules and not repeated in this individual rule; this is currently duplicated to a large extent by NOISE-R1 to R3.

NOISE-R16 – bird scaring devices should have noise limits in terms of the LAE or LAFmax metrics

NOISE-R23 – noise limits should be in a district-wide table

NOISE-R23 – use of the L10 metric is contrary to National Planning Standards

NOISE-R26/R27 – these require restructuring or coordination so R27 is also contingent on R26

NOISE-APP40 – there is no justification for different ventilation provisions in relation to the port effects control overlay and the city centre zone; a single standardised set of ventilation requirements should be specified; these should also apply with respect to NOISE-R22 (road noise).

Urban form and development		
Area matters relate to	Comments/Explanation	Recommendations
Part 2 SRMR-UFD-O4 Planned and coordinated infrastructure services and transport [RPS]	<b>Support:</b> NMH supports this objective especially in regards to coordinating both community services and transport connections. This will enables people to easily navigate their community to access their daily needs. This is important especially for our ageing population who need to easily access services so that they can stay independent. NMH is pleased that this objective supports a modal shift in transport because this offers people a range of transport choices including walking and cycling which has physical and mental health benefits. This will help reduce the effects of climate change.	Support
Part 2 SRMR-UFD-O5 Compact urban form SRMR-UFD-P5 Achieving a compact urban form	<b>Support:</b> NMH supports this objective. There are many perceived benefits of the compact urban forms, which include: less car dependency thus lower emissions, reduced energy consumption, better public transport services, increased overall accessibility, the re-use of infrastructure and previously developed land, a regeneration of existing urban areas and urban vitality, a higher quality of life and the preservation of green space. <sup>3</sup>	Support
Part two SRMR-UFD-P1 Housing bottom lines [RPS]	<b>Oppose:</b> NMH understands that it is important that Nelson needs to have sufficient adequate housing supply and supports this. NMH is disappointed that the bottom lines relate solely to the supply of land rather than also having bottom-lines that relate to housing typology, universal design standards or energy efficiency. This is an omission. Much of New Zealand’s existing housing stock is typically three-	<b>Add the following clauses to SRMR-UFD-P1:</b> <i>Ensure that universal design standards and energy efficiency standards are applied to new residential developments</i> <i>Ensure that the number of smaller dwellings (1-2 bedroom houses) is increased to match demand.</i>

3

[https://www.reading.ac.uk/PeBBu/state\\_of\\_art/urban\\_approaches/compact\\_city/compact\\_city.htm#:~:text=There%20are%20many%20perceived%20benefits,a%20regeneration%20of%20existing%20urban](https://www.reading.ac.uk/PeBBu/state_of_art/urban_approaches/compact_city/compact_city.htm#:~:text=There%20are%20many%20perceived%20benefits,a%20regeneration%20of%20existing%20urban)

	<p>bedroom standalone housing on large properties. Our changing demographic structure means that there will be greater demand for smaller single level houses in locations with good access to services and amenities<sup>4</sup>. Also there is a need to ensure that houses can cater for a broad range of abilities, that is why universal design is critically important so if home occupiers injure themselves or as they age, then they can continue to use their homes without expensive modifications. In addition to this it is important these homes are as warm, dry and energy efficient as possible so people can stay healthy in their homes as well as reduce their environmental impact. These three elements need to form part of the Housing Bottom Lines.</p>	
<p>Part two SRMR-UFD-P5 Achieving a compact urban form</p>	<p><b>Support in part:</b> Overall NMH supports the intention of the policy to enable intensification around town and suburban centres and have good accessibility by public and active transport. NMH seeks a minor wording change in relation to modes of transport so that policy could improve access to these transport modes. NMH also like to see this policy be more explicit about ensuring that new growth is designed in a manner that provides housing that enables people to age in place.</p>	<p><b>Amend SRM-UFD-P5 (1)(a)</b> to enable intensification around other centres, and in other locations with good accessibility to commercial activities and community services by public <del>or</del> <b>and</b> active transport</p> <p><b>Add an additional clause</b> to SRM-UFD-P5 (1): (d) enable people to age in place by creating smaller dwellings on single levels.</p>
<p>Part two SRMR-UFD-P6 Managing subdivision, use and development</p>	<p><b>Support:</b> NMH is pleased to see that this policy includes requirements that subdivision have attractive, healthy residential neighbourhoods.</p>	

<sup>4</sup> Taylor, A. (2016) *Building Affordable Elderly Housing: How New Zealand's planning system influences market outcomes*  
[https://www.planning.org.nz/Attachment?Action=Download&Attachment\\_id=3777](https://www.planning.org.nz/Attachment?Action=Download&Attachment_id=3777)

<p>Part 3</p> <p>UFD-O1 Accommodating future demand for business and housing</p> <p>UFD-O2 Managing growth and change</p> <p>UFD-O3 Housing choice</p> <p>UFD-O4 Maintaining and enhancing amenity values</p> <p>UFD-P1 Enabling and subdivision and development</p> <p>UFD-P2 Provision of infrastructure services and transport connections</p> <p>UFD-P8 Enabling a range of housing types</p> <p>UFD-P9 Residential intensification</p> <p>UFD-p10 Quality urban design</p> <p>UFD-P15 Maintain and enhancing amenity values and local character</p> <p>UFD-P16 Minimising potential adverse nuisance effects</p>	<p><b>Support:</b> NMH supports these objectives and policies as they align with the Strategic Outcomes in the Plan, specifically in relation to creating a vibrant, attractive, connected, and well-planned city that is engage in climate change mitigation, adaption, innovation and resilience.</p> <p>In regards to housing types and residential intensification, NMH recommendations that life time design is used to ensure that people are able to age in place.</p>	
<p>UFD-P10 Quality urban design</p> <p>UFD-P15 Maintain and enhancing amenity values and local character</p>	<p><b>Support in part.</b> NMH supports these policies. NMH understands that there are no specific rules package in this chapter. However in regards to the chapters that relate to this policy, NMH would like to see a requirement to add trees to grass berms especially in residential areas (GRZ, MRZ) as this would have aesthetic, mental health and environmental benefits.</p>	<p><b>Amend the Land Development Manual to increase tree planting on grass berms.</b></p>

Subdivision		
Area matters relate to	Comments/Explanation	Recommendations
<p>Part 3</p> <p>SUB-O1 Form and Function</p>	<p><b>Support:</b> NMH supports these objectives.</p>	

SUB-O2 Subdivisions and infrastructure		
Part 3 SUB-P1 Zones and patterns of development SUB-P2 Infrastructure, SUB-P4 Infrastructure: Design outcomes SUB-P7 Natural Hazards SUB-P9 Urban Design SUB-P10 Urban design: Development areas SUB-P11 Residential zones: Density	<b>Support:</b> NMH supports these policies especially in regards to safe and efficient connections, safe speed environments, connections into reticulated water supply and waste water, well connected transport network, public open space network,	
SUB-P12 Residential zones: Multi-unit developments	<b>Support in part:</b> NMH supports this policy in relation to incorporating low impact stormwater design, and water efficient building design but questions why energy efficiency and the promotion of low-carbon buildings was also not included within this section. Consideration could be given to using a Life Cycle Assessment to provide useful information to support eco-efficient and to reduce the climate impact of buildings <sup>5</sup> . NMH supports the integrations with the residential amenity values of the neighbourhood. NMH would like to see recognition within this section of the importance of including universal design principles to cater for the ageing population. NMH notes that the intention of SUB-P12 (4) is unclear and requests that the wording is reviewed.	<b>Add the following clauses to SUB-P12 as follows</b> (6) <i>incorporating energy efficient, low carbon building design</i> (7) <i>incorporating universal design principles.</i>

<sup>5</sup> Chandrakumar, C (2020) *A science-based approach to setting climate targets for buildings: The case of a New Zealand detached house*. Building and Environment Vol. 169. Feb 2020  
<https://www.sciencedirect.com/science/article/abs/pii/S0360132319307723?via%3Dihub>

MRZ-Medium Density Residential Zone	<b>Support in part:</b> NMH would like to mechanisms add to the Controlled and Discretionary Activities stating that a proportion of the units must meet universal design guidelines.	<b>Add provisions</b> to the Controlled and Discretionary Activities that a proportion of the units must meet universal design guidelines.
SUB-S2 Minimum Lot size: MRZ – Medium Density residential zone	<b>Support in Part:</b> To incentivise the provision of medium density housing that has universal design guidelines, consideration could be given to adjusting minimum net area if a higher proportion of units meet universal design guidelines.	<b>Amend SUB-S2</b> to enable an adjustment of net area size if units are built to universal design guidelines.
SUB-S14 Water supply [DP]	<b>Support in part:</b> NMH supports this provision would like to see definition or clarification of the term “an approved community water system” – is this defined as a community water system that is registered and compliant with the NZ Drinking Water Standards? In addition – a definition of self-sufficient potable water supply” needs defining. The Council needs to define what parameters is “drinking water” assessed in the contest of a single household.	<b>Amend SUB-S14</b> to define the terms “approved community water system” and “self-sufficient <del>potable</del> <u>drinking</u> water supply”

Signs		
Area matters relate to	Comments/Explanation	Recommendations
Part 3: General SIGNS SIGN-R24	<b>Oppose: SIGN R24</b> sets out the maximum number, area, width and height for free standing directional signs. NMH operates large facilities with many departments / services operating out of the same site and accessed off the same entrances. Adequate signage is required in order to appropriately direct patients, their family and staff. Therefore NMH recommends that the restrictions on sign size and number	<b>Amend the Standard so that there is no limit on number and area of signs provided they are related solely to health “</b>  <b>Add</b> the following new clause to Matter of Discretion:

	are removed and there is no limit on the signs provided that they relate solely to health.	<u>“X. Whether the proposed sign is required for operational purposes.”</u>
Part 3: General SIGNS SIGN-R25	<b>Oppose:</b> SIGN R24 sets out the maximum number, area, width and height for free standing signs or sign attached to buildings. NMH operates large facilities with many departments / services operating out of the same site and accessed off the same entrances. Adequate signage is required in order to appropriately direct patients, their family and staff. Therefore NMH recommends that the restrictions on sign size and number are removed and there is no limit on the signs provided that they relate solely to health.	Amend the Standard so that there is no limit on number and area of signs provided they are related solely to health “  <b>Add</b> the following new clause to Matter of Discretion: <u>“X. Whether the proposed sign is required for operational purposes.”</u>
Part 3: General SIGNS	NMH would like to see additional rules added to the Sign chapter to control the use of alcohol marketing signs. Evidence has shown that exposure to commercial communications of alcohol is associated with the likelihood that adolescents will start to drink <sup>6</sup> . Becoming intoxicated at a young age is a strong predictor of having problems with alcohol as an adult. <sup>7</sup>  The misuse of alcohol by young people has been associated with increased risks of a number of adverse outcomes including: motor vehicle collisions, injuries and deaths; crime; violence; sexual risk taking; mental health problems and victimisation <sup>8</sup> .  There is consistent evidence to suggest that a substantial fraction of New Zealand young people engage in heavy drinking including hazardous drinking, alcohol abuse and alcohol dependence. Over a third of young people engage in binge drinking or hazardous drinking and by the age of 25 over 20% will have developed a significant alcohol related problem.  As there is a linkage between exposure to alcohol advertising and harm to adolescence and children, NMH would like to see limitations put on the placement	<b>Add</b> an additional clause to SIGN-P2 <u>6. do not advertise or market alcoholic products within 100 metres of health, educational or community facilities</u>  <b>Amend</b> SIGN-R-14 Residential <u>1 (e) do not advertise or market alcoholic products within 100 metres of health, educational or community facilities</u>  <b>Amend</b> SIGN-R-21/23 Open space and recreation zones and R-22 Saxton Oval or Rutherford Park <u>1 (e) do not advertise or market alcoholic products</u>  <b>Add</b> SIGN-S1 Location: <u>3 do not advertise or market alcoholic products within 100 metres of health, educational or community facilities</u>

<sup>6</sup> Alcohol Healthwatch (2019) An exploratory audit of off-licence compliance with the Auckland Council Signage Bylaw, Otara-Papatoetoe

<sup>7</sup> Newton-Howes et al (2009) Comparison of age of first drink and age of first intoxication as predictors of substance use and mental health problems in adulthood. Drug and Alcohol Dependence Vol 194 238-243

<sup>8</sup> <https://www.otago.ac.nz/christchurch/otago018747.pdf>

	<p>of Alcohol signage near educational facilities so that young people are protected. The same limitations on the placement of alcohol advertisements should also apply to other sensitive sites such as community or health facilities to protect those who may be seeking alcohol or addiction services.</p> <p>Auckland Council is currently looking to restrict off-licence signage on public land.</p>	
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Residential Zones		
Area matters relate to	Comments/Explanation	Recommendations
Part 4 RESZ Residential zones & GRZ – General residential zone GRZ-O1 Growth and development GRZ-O2 High quality residential environments GRZ-P1 Neighbourhood character, amenity and safety GRZ-P2 Residential outcomes GRZ-P3 Residential development GRZ-P8 Connection to water and wastewater	<p><b>Support in part:</b> NMH supports the objectives especially in regards to having good levels of residential amenity, offering a range of housing types and forms. NMH also supports the focus on providing safe attractive street environment.</p> <p>NMH notes that the policies allow for a mix of residential developments which provides people with housing options. It is worth noting that there is no mention of provisions that allow people to age in place such as universally designed homes. This will continue to be important as our population ages.</p> <p>NMH notes that the NCC does not have requirements for new buildings to achieve environmental standards such as Green Star. NMH recommends that that environmental standards are encouraged and incentivised so that that greenhouse gas emissions as part of the building process are lowered.</p>	<p>Add incentives for environmental standards for new builds</p>
Part 4 RESZ Residential zones & GRZ – General residential zone GRZ-R7 Four or more residential units	<p><b>Support in part:</b> Nelson currently has an under supply of houses which have universal design. Universal design ensures a home can be adapted to meet the life-time needs of the resident from the stage where they have young children in pushchairs to when they are elderly and/or have a disability. Specifically, it describes the concept of designing housing features to be aesthetic and usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life.</p>	<p>Add an clause to GRZ-R7 (3) as follows:            (d) 1 residential unit is built to universal design standards (4-9 dwellings)            (e) minimum 20% of dwellings incorporate universal design guidelines.            (10+)</p>



	<p>NMH believes that consideration should be given to requiring the incorporation of universal design standards within a certain proportion of multi-unit developments. The following standards are used by Banyule City Council in Melbourne, Australia<sup>9</sup>:</p> <ul style="list-style-type: none"> <li>a) 3-9 dwellings = minimum of one dwelling incorporate Liveable Housing Design Guidelines</li> <li>b) 10+ dwellings = minimum 20% of dwellings incorporate Liveable Housing Design Guidelines</li> </ul> <p>NMH recommends that NCC adopts this approach in order to adapt housing to meet the needs of an ageing population.</p>	
<p>Part 4 RESZ Residential zones &amp; GRZ – General residential zone GRZ-R12 Medical and health activity</p>	<p><b>Support in part:</b> NMH support the requirements for this section as appropriate but would like to request that the gross floor area occupied by the activity is greater than 100m<sup>2</sup>. As our population ages, there will be greater demand on the health services, it is important that primary health services are readily available in the community and able to serve their community as needed. NMH advocates that the health care facilities are able to occupy a gross floor area of a building less than 500m<sup>2</sup>.</p> <p>In addition, NMH would like to see the timing for vehicle movements to be extended to 7.00am and 9.00pm. This allows for health service providers to tailor their programmes to clients as needed.</p>	<p><b>Amend</b> GRZ-R12- 3c as follows: The gross floor area occupied by the activity is less than <del>100m<sup>2</sup></del> to <b>500m<sup>2</sup></b></p> <p><b>Amend</b> GRZ-R12- 3d as follows: all vehicle movements associated with the activity, including delivery vehicles and client vehicles, occur between <del>8.00am and 8.00pm</del> to <b>7.00am and 9.00pm</b></p>
<p>Part 4 RESZ Residential zones &amp; GRZ – General residential zone GRZ-S11 Parking and Loading</p>	<p><b>Support in part:</b> NMH understands that the parking requirements have been removed as a requirement from the National Policy Statement on Urban Design Standards. NMH would like to see requirements to be added for cycle parking for sites which have four or more residential units. The addition of cycle parking would encourage people to cycle. This supports the strategic priorities in the Government’s Position Statement to offer Better Travel Options. This also has positive health benefits.</p>	<p><b>Add</b> an additional Standard for GRZ-S11 to require four cycle parks to be provided for sites which have four or more residential units or sites which contain commercial or community services.</p>
<p>Part 4 RESZ Residential zones &amp; GRZ – General residential zone</p>	<p>As discussed above, NMH recommends that the Development Manual is updated to include minimum cycle parking requirements</p>	<p><b>Amend</b> the Land Development Manual to reflect minimum cycle parking requirements. .</p>

<sup>9</sup> <https://www.banyule.vic.gov.au/files/assets/public/operating-images-amp-docs/documents/liveable-housing-design-guidelines.pdf>

<p>Nelson Tasman Land Development Manual 2019 mandatory requirements – Transport</p>		
<p>Part 4 RESZ Residential zones &amp; GRZ – General residential zone MRZ-O1 Providing for growth MRZ-O2 Neighbourhood character MRZ-O3 Amenity values</p>	<p><b>Support:</b> NMH supports the objectives especially in regards to having good levels of residential amenity, offering a range of housing types and the creation of attractive, healthy and safe residential neighbourhoods.</p>	<p><b>Support</b></p>
<p>Part 4 RESZ Residential zones &amp; GRZ – General residential zone MRZ-P1 Housing types and forms MRZ-P2 Neighbourhood character, amenity and safety MRZ P3-4 Amenity MRZ P5 Multi-unit housing</p>	<p><b>Support in part:</b> NMH strongly supports the purpose of the medium density residential zone, close to the city centre. The sustainable use of land and infrastructure, compact walkable neighbourhoods promoting incidental exercise and improved social interactions, and more affordable housing for smaller household sizes are just some of the benefits that urban intensification can provide, leading to improved community health and wellbeing outcomes.</p> <p>NMH considers that the Nelson Plan needs to go a step further in order to effectively provide a diversity and form of housing which caters for Nelson’s ageing population and/or those living with disabilities. The current housing stock struggles to function adequately for people with impairments and tends to be costly to adapt. The poor functionality and accessibility of New Zealand’s housing stock contributes to the process by which individuals’ limitations are transformed into a disability. NMH would like to see specific reference in <i>MRZ-P1 Housing types and forms</i> and <i>MRZ P5 Multi-unit housing</i> to embed universal design into the policy</p> <p>Older people have more sensory and physical limitations than younger people. Housing that does not meet their needs exacerbates existing health conditions and heightens the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shifts the cost of what is primarily a housing problem onto the health and social services sectors.<sup>10</sup></p>	<p><b>Add a clause to MRZ-P1:</b> Ensure at least 20% of the housing above is built to universal design standards.</p> <p><b>Add a clause to MRZ-P5</b> Integrates lifetime design principles</p>

<sup>10</sup> 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.

	<p>Universal design ensures a home is sustainable and can be adapted to meet the life-time needs of the resident from the stage where they have young children in pushchairs to when they are elderly and/or have a disability.<sup>11</sup> Specifically, it ‘describes the concept of designing housing features to be aesthetic and usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life’.<sup>12</sup></p> <p>NMH believes that consideration should be given to requiring the incorporation of universal design standards within a certain proportion of large multi-unit developments. The following standards are used by Banyule City Council in Melbourne, Australia:<sup>13</sup></p> <ul style="list-style-type: none"> <li>a) 10+ dwellings = minimum 20% of dwellings incorporate Liveable Housing Design Guidelines</li> <li>b) 3-9 dwellings = minimum of one dwelling incorporate Liveable Housing Design Guidelines</li> <li>c) 1-2 dwellings = voluntary incorporation of guidelines</li> </ul>	
<p>Part 4 RESZ Residential zones &amp; GRZ – General residential zone MRZ-P8 Non-residential activities</p>	<p><b>Support:</b> NMH supports this policy in relation to supporting health care facilities along with community services within these settings.</p>	
<p>Part 4 RESZ Residential zones &amp; GRZ – General residential zone MRZ-R7 Four or more residential units</p>	<p><b>Support in part:</b> As discussed above, NMH recommends an additional clause is added to support the inclusion of universal design standards within a certain proportion of multi unit developments.</p>	<p>Add an clause to MRZ-R7 (3) as follows: (d) 1 residential unit is built to universal design standards (4-9 dwellings) (e) minimum 20% of dwellings incorporate universal design guidelines. (10+ dwellings)</p>
<p>Part 4 RESZ Residential zones &amp; MRZ – Medium Density residential zone MRZ-R13 Medical and health activity</p>	<p><b>Support in part:</b> NMH support the requirements for this section as appropriate but would like to request that the gross floor area occupied by the activity is 500m<sup>2</sup>.</p>	<p><b>Amend</b> MRZ-R13- 3c as follows: The gross floor area occupied by the activity is less than <del>100m<sup>2</sup></del> to <u>500m<sup>2</sup></u></p>

<sup>11</sup> Lifemark. 2017. Positive changes: More access to more homes. <http://www.lifemark.co.nz/news/positive-changes-more-access-to-more-homes/>

<sup>12</sup> BRANZ. N.d. Universal Design. [https://www.branz.co.nz/cms\\_display.php?sn=215&st=1](https://www.branz.co.nz/cms_display.php?sn=215&st=1)

<sup>13</sup> Banyule City Council. N.d. Liveable housing: Liveable Housing Design Guidelines

	In addition, NMH would like to see the timing for vehicle movements to be extended to 7.00am and 9.00pm. This allows for health service providers to tailor their programmes to clients as needed.	<b>Amend MRZ-R13- 3d as follows:</b> all vehicle movements associated with the activity, including delivery vehicles and client vehicles, occur between <del>8.00am and 8.00pm</del> to <b>7.00am and 9.00pm</b>
Part 4 RESZ Residential zones & MRZ – Medium Density residential zone MRZ-S11 Parking and Loading	<b>Support in part:</b> NMH would like to see requirements to be added for cycle parking for sites which have four or more residential units. The addition of cycle parking would encourage people to cycle. This supports the government’s position on creating mode share. This also has positive health benefits.	Add an additional Standard for MRZ-S11 to require four cycle parks to be provided for sites which have four or more residential units or sites which contain commercial or community services.
Part 4 RESZ Residential zones & MRZ – Medium Density residential zone Nelson Tasman Land Development Manual 2019 mandatory requirements – Transport	As discussed above, NMH recommends that the Development Manual is updated to include minimum cycle parking requirements	<b>Amend</b> the Land Development Manual to reflect minimum cycle parking requirements.
Part 6 RESZ – Residential zone APP42 – Design guide and rules for Wakefield Quay	Support in part: NMH supports the overall intention of this Chapter but notes that there is no mention of sea level rise or extreme weather events within the Chapter. In order to ensure that this area is resilient, it is important that the design guide and rules reflect these challenges and there are rules in place to assist property owners to adapt or mitigate future climatic events.	<b>Amend:</b> APP42 to acknowledge sea level rise and extreme weather events
Part 6 RESZ – Residential zones APP43 – General and Medium density residential zone: Multi-unit development - Matters of discretion	Support in part: NMH supports these matters of discretion but recommends that they are extended to include a requirement to include universal design standards within a certain proportion of multi-unit developments.	<b>Amend:</b> APP43 to include universal design provisions

Commercial and mixed use zones		
Area matters relate to	Comments/Explanation	Recommendations
Part 4 CMUZ – Commercial and mixed use zones NCZ – Neighbourhood centre zone NCZ-O1-3 Objectives NCZ-P1-6 Policies	<b>Support in part:</b> NMH would like to see the inclusion of minimum cycle parking standards	<b>Add</b> minimum cycle parking standards
Part 4 CMUZ – Commercial and mixed use zones NCZ – Neighbourhood centre zone NCZ-O1-3 Objectives LNCZ-P1-6 Policies	<b>Support:</b> NMH supports the objectives and policies. Neighbourhood centres offer essential services to local residents.	<b>Support</b>
Part 4 CMUZ – Commercial and mixed use zones NCZ – Neighbourhood centre zone NCZ-R10 Medical and health activity	<b>Support:</b> NMH supports the provisions given in this section as appropriate.	<b>Support</b>
Part 4 CMUZ – Commercial and mixed use zones NCZ – Neighbourhood centre zone NCZ-S9 Parking and Loading	<b>Support in part:</b> NMH would like to see requirements to be added for cycle parking. This would support cyclists to cycle.	<b>Add:</b> A new standard to NCZ-S9 that is set against standards set in Part 6 EIT  <i>Onsite cycle parks are required to be provided.</i>
Part 4 CMUZ – Commercial and mixed use zones NCZ – Neighbourhood centre zone NCZ-S11 Hours of Operation	<b>Oppose:</b> NMH would like to see stronger provisions within the District Plan to restrict the sale of alcohol, Alcohol use is a leading driver of preventable harm, negatively impacting both drinkers and others. Harms are wide ranging and include poor health, disorder and damage to property, injuries, lost productivity, reduced child wellbeing, and violence. Local Alcohol Policies and District Plans are mechanisms that Councils can use to control the sale of alcohol. NMH recommends that there is alignment with Tasman and Nelson’s approach to alcohol and recommends that the District Plan mirrors Tasman’s restrictions.  NMH recommends that the hours for the sale of liquor are reduced for Local Centre Zones, Mixed Use Zone and Neighbourhood Use Zone.	<b>Amend NCZ S11 to</b> <b>2. Any activity that involves the sale of liquor for consumption on the premises that is located:</b> a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor only during the following hours: Daily: <del>7:00am – 3:00am</del> the following day to <u>8:00am – 2:00am</u> the following day  <u>Any activity that involves the sale of liquor for consumption somewhere else: a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor</u>

	<p>Nightlife activity should be focused on the central city where it can be managed easily rather than being scattered into residential areas where there can be nuisance effects late at night.</p> <p>NMH also notes that the proposed Plan is silent on the off-licences (licensee sells alcohol from a premises for consumption somewhere else).</p> <p>NMH would like to see off-licence provisions added to the Plan</p>	<p><i>only during the following hours: Daily: 7.00am – 10pm</i></p>
<p>Part 4 RESZ Residential zones &amp; CMUZ – Commercial and mixed use zones NCZ – Local centre zone</p> <p>Nelson Tasman Land Development Manual 2019 mandatory requirements – Transport</p>	<p>As discussed above, NMH recommends that the Development Manual is updated to include minimum cycle parking requirements</p>	<p><b>Amend</b> the Land Development Manual to reflect minimum cycle parking requirements.</p>
<p>Part 4 CMUZ – Commercial and mixed use zones LCZ – Local centre zone</p> <p>LCZ-O1-4 Objectives</p> <p>LCZ-P1-6 Policies</p>	<p><b>Support in part:</b> NMH supports the objectives especially in regards to local centre zones featuring strong pedestrian friendly streetscapes that are safe and attractive. NMH supports the policies because they complement the objectives. It noted that in LCZ_P3 Local centre build environment – there is no specific direction to create safe, attractive and accessible pedestrian spaces, this omission could result in this outcome being overlooked.</p>	<p><b>Amend LCZ-P3 (2)</b> to  <i>... are visually integrated with <u>safe, accessible and attractive pedestrian spaces:</u></i></p>
<p>Part 4 CMUZ – Commercial and mixed use zones LCZ – Local centre zone</p> <p>LCZ-S9 Parking and Loading</p>	<p><b>Support in part:</b> NMH would like to see requirements to be added for cycle parking. This would support cyclists to cycle.</p>	<p><b>Add:</b> A new standard to LCZ-S9 that is set against standards set in Part 6 EIT</p> <p><i>Onsite cycle parks are required to be provided.</i></p>
<p>Part 4 CMUZ – Commercial and mixed use zones NCZ – Local centre zone</p> <p>LCZ-S11 Hours of Operation</p>	<p><b>Oppose as per NCZ-S11 Hours of Operation.</b></p> <p>NMH would like to see the provisions from Tasman District Council’s Local Alcohol Policy be adopted within this Plan to ensure regional consistency</p>	<p><b>Amend LCZ S11 to</b>  <i>2. Any activity that involves the sale of liquor for consumption on the premises that is located: a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor only during the following hours: Daily: <del>7.00am – 3.00am</del> the following day to <u>8.00am – 2.00am</u> the following day</i></p>

		<u>Any activity that involves the sale of liquor for consumption somewhere else: a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor only during the following hours: Daily: 7.00am – 10pm</u>
Part 4 CMUZ – Commercial and mixed use zones CCZ – City centre zone MUZ-O1-4 Objectives	<p><b>Support in part:</b> NMH supports the overall intention of these objectives but notes that <i>MUZ-O1 Function of the Mixed Use Zone</i> seems to focus on activities reliant on vehicle trips. NMH recommends that NCC adopts Christchurch City Council’s approach to the function of mixed use zones that looks at “the development of vibrant urban areas where a diverse and compatible mix of activities can coexist.<sup>14</sup>” This definition covers a broader range of compatible activities rather than focusing on mode of travel which may alter over time.</p> <p>NMH support the objectives in relation to creating positive public spaces that have convenience cycling and pedestrians connections as seen in MUZ-O3-4</p>	<b>Amend MUZ-O1</b> <i>Function of the Mixed Use Zone to better reflect the overall role of the Mixed Use Zone. CCC could serve as an example.</i>
Part 4 CMUZ – Commercial and mixed use zones CCZ – City centre zone MUZ-P1-15 Policies	<p>Support in part: NMH again supports the overall intention of these policies but again questions the focus on activities that rely on vehicle movements. Our region’s demographic profile is changing and so is technology in relation to transport, therefore what is perceived to be required today may not be needed in the future. It would be beneficial for the objectives and policies to be broader and not focus solely on vehicle movements in relation to the City Centre. The Zone should provide for a range of transport modes.</p> <p>NMH strongly support the policies which improve pedestrian amenity (MUZ-P8) and provide good amenity values (MUZ-P6)</p>	

<sup>14</sup> <https://districtplan.ccc.govt.nz/pages/plan/book.aspx?exhibit=DistrictPlan> 15.2.7 Objective- Role of the Commercial Central City Mixed Use Zone

Part 4 CMUZ – Commercial and mixed use zones MUZ-R19 Medical and health	Support: NMH supports these provisions	
Part 4 CMUZ – Commercial and mixed use zones MUZ-S8 Hours of operation	<p><b>Oppose as per NCZ-S11 Hours of Operation.</b></p> <p>NMH would like to see the provisions from Tasman District Council’s Local Alcohol Policy be adopted within this Plan to ensure regional consistency.</p>	<p><b>Amend MUZ S8 to</b></p> <p><i>2. Any activity that involves the sale of liquor for consumption on the premises that is located: a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor only during the following hours: Daily: <del>7.00am – 3.00am</del> the following day to <u>8.00am – 2:00am</u> the following day</i></p> <p><i><u>Any activity that involves the sale of liquor for consumption somewhere else: a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor only during the following hours: Daily: 7.00am – 10pm</u></i></p>
Part 4 CMUZ – Commercial and mixed use zones MUZ-S11 Parking and Loading	<p><b>Support in part:</b> NMH would like to see the inclusion of minimum cycle parking standards for mixed use zones and a requirement to provide end of ride facilities such as lockers and showers for cyclists on site to encourage active transport</p> <p>NMH support the matters of discretion in relation to travel management plans, provision of facilities that support cycle use.</p>	<p><b>Add:</b> A new standard to MUZ-S11 that is set against standards set in Part 6 EIT</p> <p>Onsite cycle parks are required to be provided.</p>
Part 4 RESZ Residential zones & CMUZ – Commercial and mixed use zones MUZ-S14 Nelson Tasman Land Development Manual 2019 mandatory requirements – Transport	As discussed above, NMH recommends that the Development Manual is updated to include minimum cycle parking requirements	
Part 4 CMUZ – Commercial and mixed use zones Objectives CCZ-O1-06	<b>Support:</b> NMH supports the objectives and policies especially in regards to vibrant built setting that encourages high intensity of pedestrian	



Policies CCZ-P1-15	movements and amenity, public realm, reducing the number of private car parking to maintain an attractive walking environment. .	
Part 4 CMUZ – Commercial and mixed use zones CCZ-R17 Medical and health	Support: NMH supports these provisions	
Part 4 CMUZ – Commercial and mixed use zones CCZ-S8 Parking and Loading	<p><b>Support in part:</b> NMH would like to see the inclusion of minimum cycle parking standards for the zone and a requirement to provide end of ride facilities such as lockers and showers for cyclists on site to encourage active transport</p> <p>NMH support the matters of discretion in relation to travel management plans, provision of facilities that support cycle use.</p>	<p><b>Add:</b> A new standard to MUZ-S11 that is set against standards set in Part 6 EIT</p> <p>Onsite cycle parks are required to be provided.</p> <p><b>Add:</b> a requirement to provide lockers and showers for cyclists on site to encourage active transport</p>
Part 4 CMUZ – Commercial and mixed use zones CCZ-SXX Hours of operation: New	<p>NMH notes that within this section there are no hours of operation included. NMH would like to see stronger provisions within the chapter to manage the sale of alcohol. NMH recommends that there is alignment with Tasman and Nelson’s approach to alcohol and recommends that the District Plan mirrors Tasman’s restrictions.</p> <p>NMH recommends that the hours for the sale of liquor are reduced for Local Centre Zones, Mixed Use Zone and Neighbourhood Use Zone. Nightlife activity should be focused on the central city where it can be managed easily rather than being scattered into residential areas where there can be nuisance effects late at night.</p> <p>NMH also notes that the proposed Plan is silent on the off-licences (licensee sells alcohol from a premises for consumption somewhere else). NMH would like to see off-licence provisions added to the Plan</p>	<p><b>Add CCZ SXX to</b>  <u>Any activity that involves the sale of liquor for consumption on the premises that is located: a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor only during the following hours: Daily: 8.00am – 3:00am the following day</u></p> <p><u>Any activity that involves the sale of liquor for consumption somewhere else: a. more than 50 metres from a RESZ – Residential zone boundary, may be open for the sale of liquor only during the following hours: Daily: 7.00am – 10pm</u></p>

Industrial Zones		
Area matters relate to	Comments/Explanation	Recommendations
Part 4 INZ –Industrial zones LIZ - Light industrial zone LIZ-O1 Role of the zone	<b>Support:</b> NMH supports this objective that looks to avoid, remedy or mitigate nuisance effects within the Zone itself and the surround zones.	
Part 4 INZ IZ Light industrial zone LIZ-S6	<b>Support in part:</b> NMH would like to see the inclusion of minimum cycle parking standards for the zone and a requirement to provide lockers and showers for cyclists on site to encourage active transport	<b>Add to LIZ-S6:</b> minimum cycle parking standards for the zone and a requirement to provide lockers and showers for cyclists on site to encourage active transport
Part 4 GIZ General Industrial zone LIZ-S6	<b>Support in part:</b> NMH supports the overall intention of the policies within the chapter. NMH notes that the provision GIZ-P6 does not make any specific reference to nuisances such as odour or hazardous substances. NMH would encourage NCC to consider adding the following wording into this policy in regards to the interface between this Zone and more sensitive zones: <i>Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, providing a buffer between residential areas and the Industrial Heavy Zone.</i> <sup>15</sup>	<b>Add to LIZ-S6:</b> : <i>Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, providing a buffer between residential areas and the Industrial Heavy Zone</i>
Part 4 GIZ General Industrial zone GIZ-S6 Parking and loading	<b>Support in part:</b> NMH would like to see the inclusion of minimum cycle parking standards for the zone and a requirement to provide end of ride facilities such as lockers and showers for cyclists on site to encourage active transport	<b>Add to GIZ-S6</b> minimum cycle parking standards for the zone and a requirement to provide lockers and showers for cyclists on site to encourage active transport

<sup>15</sup> <https://districtplan.ccc.govt.nz/pages/plan/book.aspx?exhibit=DistrictPlan> 16.2.1.3 (a) (i)(A) Policy - Range of industrial zones

Open Space		
Area matters relate to	Comments/Explanation	Recommendations
Part 4 OSRZ NOSZ Natural open space zone Objectives and Policies NOSZ-O1	<b>Support:</b> NMH supports the objectives and policies in this chapter especially in regards to provisions relating to current and future recreation, health and wellbeing and protecting community water supplies.	
Part 4 OSRZ NOSZ Natural open space zone NOSZ-S5 Access	<b>Support in part:</b> NMH notes that there are provisions for vehicle access to specific sites. Consideration also could be given to providing pedestrian and/or cycle access to site rather than solely vehicle access. This enables people to use other transport modes.	
Part 4 Zones OSZ Open space and recreation zones OSZ-O1-2 Objectives	<b>Support in part:</b> NMH supports the intentions of the objectives of this chapter especially in regards to the provision of facilities that meet the health and wellbeing needs of the community; that are accessible and distributed widely across the community and contribute to a high-quality urban environment.  NMH notes that there is no recognition within the Objectives about ensuring that the inherent qualities of natural areas and water bodies within open spaces are protected, maintained and enhanced. This appears to be an omission and NMH recommends that an additional objective is added to the Plan	Add an additional Objective (OSZ-O3) that states: <a href="#">The inherent qualities of natural spaces and water bodies in Open Spaces are protected, maintained and enhanced.</a>
Part 4 Zones OSZ Open space and recreation zones PSZ P1-P5 Policy	<b>Support in part:</b> NMH supports the intentions of the policy of this chapter especially in regards to allocating open space areas in growth areas, being consistent with CPTED principles, and supporting community and recreation activities and facilities on the site.  This chapter does not appear to have a policy direction around maintaining and enhancing, where appropriate, public access connections to walking and cycling track networks	Add an additional Policy (PSZ-O6) that states: <a href="#">Maintain and enhance, where appropriate, public access connections to walking and cycling track networks</a>
Part 4 Zones OSZ SARZ Sport and active recreation zone	<b>Support:</b> NMH supports the intentions of the objectives and policies of this chapter especially in regards to the provision of facilities that meet the health and wellbeing needs of the community; contributes to a high-quality	

SARZ-P1-4 Objectives SARZ-P1-4 Policy	urban environment; and maintain the predominance of open space. Access to open space is an important aspect of maintaining good public health.	
Part 4 Zones OSZ SARZ Sport and active recreation zone SARZ-S4	<b>Support in part:</b> NMH would like to see the inclusion of minimum cycle parking standards for the zone and a requirement to provide lockers and showers for cyclists on site to encourage active transport	<b>Add to SARZ-S4</b> minimum cycle parking standards for the zone and a requirement to provide lockers and showers for cyclists on site to encourage active transport

Saxton development area		
Area matters relate to	Comments/Explanation	Recommendations
Part 4 DEV2 – Saxton development area DEV2-O1-2 & DEV2-P1-3 DEV-P4	<b>Support:</b> NMH supports the intentions of the objectives and policies in particular in relation to creating attractive, safe, compact urban forms. NMH is pleased to see that there is a focus on creating a variety of densities and housing types as this will cater to a broader number of people. NMH is also pleased to see that a neighbourhood centre is allowed within the zone that caters to the day-to-day needs of the community. The residential area to the north of the Saxton development area does not have easy access to a neighbourhood area.	
Part 4 DEV2 – Saxton development area DEV-P4	<b>Support in part:</b> DEV2-P4 states “encourage” the street network and or pedestrian and cycle connections align with a new shared path to Main Road Stoke cycleway. NMH recommends that this provision is strengthened to a requirement. Integrating this into the Planning Framework now demonstrates a commitment to the provision of active transport infrastructure.	<b>Amend DEV-P4 Street Network to</b> <b>3. encourage require that</b> the street network and/or pedestrian and cycle connections to align with a potential new shared path to the Main Road Stoke cycleway.

Hospital Zone		
Area matters relate to	Comments/Explanation	Recommendations
Part 4 Area Specific Matters: Hospital Zone	<b>Support.</b> NMH support the introduction of a specific Hospital zone to enable NMH to provide tertiary healthcare services and to allow for appropriate redevelopment within the hospital campus.	<b>Support</b>
Part 4 Area Specific Matters: Hospital Zone Objectives and Policies	<b>Support in part:</b> NMH supports the objectives and policies within the Hospital zone section.  NMH recommend that a new policy is added that encouraged comprehensive medium density residential development of hospital sites that were no longer required for hospital purposes. This is consistent with the Future Development Strategy. The hospital site has existing woodblocks that should be protected from development. These should be identified and given protection within the Standards, an additional requirement should be added to <u>retain the woodblocks as reserve space and retain parklike aesthetics of the site.</u>	<b>Add</b> the following policy <u>“HOSZ-P7 – Comprehensive Residential Development</u>  <u>Encourage comprehensive residential development of suburban sites that are no longer required for hospital purposes.”</u>  <b>Add</b> a requirement to <u>retain the woodblocks as reserve space and retain parklike aesthetics of the site.</u>
Part 4 Area Specific Matters: Hospital Zone Policies HOSZ-P5	<b>Support in part:</b> Consideration could be given to adding wording that provides for safe access of public transport on the site. This is to ensure that public transport is integrated in the planning for the hospital redevelopment and that Council enables traffic movements that would allow for buses to manoeuvre easily into the site.	<b>Add to HOSZ-P5</b>  Safe access of public transport to and from the site.
Part 4 Area Specific Matters: Hospital Zone HOSZ-S1-S6	<b>Support in Part:</b> The matters of discretion set out a number of matters to consider. Whilst generally acknowledging the importance of these matters, there is no reference to the operational, accessibility and security requirements of a hospital that is first and foremost focussed on the delivery of health services. The NMH therefore requests that the matters of discretion include a reference to this as an overriding matter.	<b>Amend</b> the Matter of Discretion in HOSZ S1-6 as follows:  <u>“Taking into account the operational, accessibility and security requirements of the hospital,</u>

<p>Part 4 Area Specific Matters: Hospital Zone HOSZ-S1</p>	<p><b>Support in Part:</b> NMH is preparing its detailed business case for redevelopment of the Hospital Site. Given the topography of the land, it is likely that NMH will need to advocate for differential heights across the site. Therefore we would like the maximum height requirements to be altered.</p> <p>NMH notes that a 20m height limit will provide for 4 floors, but not lift shafts, etc. and that 4 floors is the minimum necessary height limit for the efficient use of the site. For these reasons, NMH requests that that lift shafts, etc. are excluded from the height calculation.</p>	<p>NCC continue to liaise with NMH facility staff around the maximum height of buildings as the detailed business case is developed in 2021.</p> <p><b>Amend</b> the Standard as follows: “that lift shafts, mechanical plant and other such equipment shall be allowed to the maximum 4 metres in height above that of the XXm building height.”</p>
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Energy, infrastructure and transport		
Area matters relate to	Comments/Explanation	Recommendations
<p>Part 2 20 Energy, infrastructure and transport SRMR-EIT-P1 Provide for regionally significant infrastructure SRMR-EIT-P2 Adverse effects of regionally significant infrastructure regionally significant infrastructure</p>	<p><b>Support:</b> NMH supports the policy to maintain and upgrade regionally significant infrastructure so that is resilient to the effects of climate change. In addition, NMH supports the policy which avoids, remedies or mitigates the adverse effects on the environment of regionally significant infrastructure.</p>	<p><b>Support</b></p>
<p>Part 2 20 Energy, infrastructure and transport SRMR-EIT-P4 Energy supply</p>	<p><b>Support:</b> NMH supports the policy related to encouraging and enabling the development of renewable energy and improved efficiency in the use of energy, in particular the encouraging effective insulation of residential dwellings, ultralow emission burning wood burners and facilities for charging electric vehicles.</p>	<p><b>Support</b></p>

<p>Part 3 EIT-P11 Transport: Public and active transport</p>	<p><b>Support in part:</b> NMH supports the provisions in this policy. It is pleasing to see that NCC are now prioritising active transport. Active forms of transport, such as walking and cycling, have a range of environmental benefits, including producing no air pollution, noise pollution or greenhouse gases.</p> <p>Walking or cycling for transport helps integrate physical activity into everyday life. The health benefits of active transport include increased physical activity, improved mental health and reduced risk of diseases, such as cardiovascular diseases and cancer.</p> <p>NMH would like to see that priority is given to walking and cycling modes on local roads. In the development of intersections in new subdivisions, cars would need to give way to active modes who are travelling straight. This design appears to be working successfully in Stoke near the Railway Reserve and aligns with Waka Kotahi proposal (March 2020) to give priority to straight travelling modes rather than turning traffic.</p> <p>NMH would like to see this approach being used on local roads (according to the road hierarchy) across Nelson and would like the Land Development Manual updated to facilitate this.</p>	<p><b>Amend</b> the policy to include requirements for providing walking and cycling infrastructure rather than only providing encouragement.</p> <p><b>Amend</b> the Land Development Manual to enable the prioritisation of pedestrian and cyclists at intersections on the local road network.</p>
<p>Part 6 EIT – Energy, infrastructure and transport APP22 – Standards and terms for Vehicle access and crossing</p>	<p><b>Support in part:</b> NMH supports the provisions that reduce conflict points between vehicles and pedestrians and cyclists as this will reduce the number and severity of accidents.</p> <p>It would be of value to have standards and terms for cyclist access. Access for cyclists may be different than that for pedestrians and motorists.</p> <p>Therefore in order support cycling, it is important that there is appropriate infrastructure in place to ensure that cyclists can have safe journeys. NMH would like to see APP22 reflect this</p>	<p><b>Amend</b> APP22 to include standards and terms for safe cycle access</p>
<p>Part 6 EIT – Energy, infrastructure and transport APP23 – Standards and terms for parking and loading</p>	<p><b>Support in part:</b> The car parking requirements have been removed as a requirement from the National Policy Statement on Urban Design Standards. Within the proposed standards for parking in the Plan, car parking and cycle parking numbers are linked. NMH would like to see these separated so that minimum requirements for cycle parking are introduced as appropriate for each activity. Currently cycle-parking is offered on an ad-hoc basis. NMH would like to see policies and standards introduced that</p>	<p>Add minimum cycle parking standards to the Plan which include the following requirements:</p> <ul style="list-style-type: none"> <li>• Stands shall be securely anchored to an immovable object.</li> <li>• Stands shall support the bicycle frame and front wheel.</li> <li>• Stands shall allow the bicycle frame to be secured.</li> </ul>

	<p>would ensure that activities provide an adequate amount of safe, secure, and convenient cycle parking and associated end of trip facilities.</p>	<ul style="list-style-type: none"> <li>• Cycle parking facilities shall be clearly signposted or visible to cyclists entering the site.</li> <li>• Cycle parking facilities shall be located so as not to impede pedestrian thoroughfares including areas used by people whose mobility or vision is restricted.</li> <li>• Cycle parking facilities shall be located so that the bicycle is at no risk of damage from vehicle movements within the site.</li> <li>• Cycle parking facilities shall be located as close as possible to and no more than 30 metres from at least one main pedestrian public entrance to the building/activity.</li> <li>• Cycle parking facilities shall be available during the hours of operation and shall not be diminished by the subsequent erection of any structure, storage of goods, or any other use.</li> <li>• Staff/ residents/ tertiary students' cycle parking facilities shall be located in: <ul style="list-style-type: none"> <li>• a covered area; and</li> <li>• a secure area, unless located in an area where access by the general public is generally excluded.</li> </ul> </li> </ul>
<p>Part 6 EIT – Energy, infrastructure and transport APP23 – Table 2: Car parking and queuing space recommendations</p>	<p><b>Oppose:</b> NMH notes that requirements for Health Facilities have increased between the current rules and the draft. This does not align with the Government Position Statement on Transport to offer better travel modes. NMH recommends that existing provisions are used.</p>	<p><b>Amend</b> APP23 – Table 2: Car parking and queuing space recommendations  <u>2</u> <del>3</del> spaces per practitioner providing the service + 1 space per assistant.</p>



## Conclusion

- NMH thanks the NCC for the opportunity to comment on the Draft Nelson Plan
- NMH supports the overall direction and intent of the Draft RPS and notes that it contains many provisions which support good environmental and health outcomes. Recommendations are made where it is considered that provisions should be improved or strengthened to better provide for the health and wellbeing of people and communities, and the healthcare services and facilities that serve the people of Nelson.
- NMH looks forward to working in partnership with NCC on public health and wellbeing issues that arise in relation to the Nelson Plan.
- NMH would also like an opportunity to have further discussion with NCC in regards to the Nelson Hospital site raised the section on the Hospital Zone in the above table.

Yours sincerely



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