

**Nelson City Council &
Tasman District Council
Saxton Field Reserve
Management Plan review**

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Nelson City Council (NCC) & Tasman District Council (TDC)'s Saxton Field Reserve Management Plan review.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

General comments

4. NMH endorses the Draft Plan. Saxton Field is critically important community asset where people of all ages can meet and recreate. Providing attractive urban green space may encourage people to spend more time outdoors and facilitate physical activity. In particular, many older people find it very difficult to maintain moderate levels of physical activity; therefore, it is important to provide green spaces that encourage older people to be active. Studies of green spaces and health have demonstrated stronger evidence for mental health benefits, for stress reduction and cognitive development in children.¹ NMH supports the vision for Saxton field as a place where "the regional community comes together to play sport and for recreation. It is an inclusive environment for everyone."

Specific Comments

5. **Question 1: Local events have priority over national and international sports fixtures**

NMH supports local events being given priority over larger fixtures. Saxton is the home to a wide range of grass-root sports from primary school children to senior events. The priority should be given to locals having easy access to sport activities. This has significant physical and mental health benefits. If larger events are prioritised, and local events are often cancelled as a result then there is a concern that people will disengage from sport. Therefore it is important that local events are prioritised.

6. **Question 2: More focus on casual recreation, improved wayfinding and accessibility**

NMH supports the Draft Plan which gives consideration to passive recreation, including walking and cycling, more drinking-water fountains, and seating for older visitors and for people with disabilities, improved wayfinding and addressing issues of interest to Te Tau Ihu iwi, particularly with regard to the reserve's natural values.

¹ https://www.euro.who.int/data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1

Accessibility

NMH is pleased to see that there are specific policies regarding accessibility in the Plan (5.4.1.1)

NMH would like to see an audit undertaken of the pathways across Saxton in relation to accessibility. Whilst there are substantial footpaths across the complex, there are sections which are difficult for pedestrians. Here are examples:

- a) There is a lack of pathway between Harakeke Green/ Saxton Pond and the Velodrome. This makes access difficult for small children wishing to bike/scoot to Velodrome.
- b) The footpath adjacent to the Junior football field has a short pathway across to road (opposite the Football club rooms) but there is no corresponding path for pedestrians between the Clubrooms and the road itself so pedestrians need to walk across the carpark.
- c) By the playground, the footpaths don't match user desire lines.
- d) There is a tree in need of arborist's attention which often obscures the footpath between the playground and the carpark.

NMH recommends that an audit is undertaken and programme of works is undertaken to improve accessibility across the site.

Sun protection and water

Nelson Tasman is one of the sunniest regions in the country, therefore NMH encourages NCC & TDC to include sun shade in any play equipment areas and the associated seating area. The provision of drinking fountains in the vicinity providing free easily accessible water in public places is also important. Adequate hydration and shade is important especially in the warmer months. NMH encourages NCC & TDC to use consistent signage on its drinking fountains so they are easy for people to identify.

NMH is pleased to see that shade provision is being reviewed. It is pleasing to see that shade sails have recently been put up at the Velodrome. Further consideration of shading (natural or artificial) is encouraged.

Seating

Seating has been raised as an issue. The number and quality of seating is important because it gives people a place to rest and socialise. Seating spaces need to have a plain design and be easily recognised as chairs to help those people with sight impairments and dementia.² Public benches need to include a centre handrail so that people can easily get in and out of seats.

² Alzheimer's Australia Vic (2016) *Creating Dementia-friendly communities: A toolkit for local government* Commonwealth and Victoria Government's Home and Community Care program
<https://www.fightdementia.org.au/files/NATIONAL/documents/Dementia-friendly-communities-toolkit-for-local-government.pdf>

Pedestrian and cycling facilities.

It is great to see that there has been an emphasis on increasing wayfinding and recreation routes for walking and cycling, In addition it would be great to see the number of cycle parks and end of ride facilities increased across all the key sites at Saxton.

NMH supports initiatives to improve connections with public transport. Saxton is on a major commuting route and roads around Saxton can be congested at times, improving public transport options would provide Saxton users with greater transport choices and make the site more accessible.

NMH supports the provision of lighting to facilitate cycling and pedestrian usage of the reserve.

Toilets

Consideration needs to be given the number of toilets on the site. Saxton is used by a great number of people throughout the day but some of the toilets on site are not always open. Wayfinding maps that show toilets would be beneficial.

7. Question 3: More focus on enhancing natural and cultural values

NMH supports enhancing the natural and cultural values of Saxton by enabling biodiversity and improving waterway health as well as enabling Te Tau Iwi to perform the roles of kaitiakitanga. NMH supports the adoption of sustainable management practices for waterways, including avoiding or limiting the use of herbicides and other chemicals.

8. Question 6: More focus on limiting commercial and sponsorship signs to maintain visual values

NMH does not have a position on commercial and sponsorship signs (other than Alcohol advertisements) at Saxton however consideration could be given providing space for community notices that promote health and wellbeing messages.

NMH has made comments regarding alcohol marketing below (Question 9).

9. Question 7: Implementing sustainability principles

NMH supports the implementation of sustainability principles at Saxton Field (e.g. encouraging events to have 'pack-it-in pack-it-out' policies for non-recyclable waste).

10. Question 8: Temporary Camping allowed with major regional and national events

NMH does not have a position on temporary camping at Saxton however should this occur, NMH recommends that there is strong waste disposal procedures in place to ensure that the littering is minimised. In addition, information about safe drinking water should also be communicated to campers to reduce the risk of waterborne illnesses. Council should ensure that other water sources which are not suitable for drinking are clearly signposted to warn campers that the water is not of drinking quality and should be boiled before use. It is important that information relating to toilet facilities, sewage disposal, litter disposal and drinking water, is effectively relayed to campers in a manner that is easily understood.

NMH recommends that an additional policy is added to 4.2.2. in relation to requirements in relation to toilet facilities, sewage and litter disposal and drinking water.

11. **Question 9: Alcohol controls (A) and the retention of Smoke free & Vapefree status (B)**

Alcohol controls

In general, NMH supports the proposed controls on alcohol. Included in this submission are some recommendations to make the controls more robust.

In regards to *Policy 4.8.1.1*. NMH recommends the Clause be more specific and recommends the following amendment: "*with the approval of NCC and TDC and regulated by ~~appropriately delegated Council~~ delegated alcohol licensing Officers*". This would ensure that the most relevant council officers regulate the sale and supply of alcohol.

In regards to the policies on alcohol, NMH recommends that *Policy 4.8.2.1* relating to the sale and supply of alcohol for consumption within the reserves is amended to include requirements for special alcohol licenses. This would provide clarity for readers.

NMH supports the *Policy 4.8.2.2* about banning the consumption of alcohol near playgrounds and sports grounds. Exposure to the consumption of alcohol leads to the normalising of drinking alcohol. An increase in the number of environments where alcohol is available leads to the increasing acceptance of alcohol in every situation. For this reason it is important to ensure that the advertising, promotion or consumption of alcohol is not permitted in playground areas and other play and activity areas including sports grounds frequented by children and youth up to 18 years of age.

NMH notes that *Policies 4.8.2.3* and *4.8.2.4* are intertwined and recommends that these policies are combined for ease of use. *Policy 4.8.2.3* aims to limit the exposure of users of the reserve to alcohol. NMH suggests that this policy is incorporated into 4.8.2.4 by requesting that alcohol consumption is confined to inside the venue's building and attached verandas.

NMH recommends that *policy 4.8.2.3* and *4.8.2.4* is amended as follows: *Alcohol licenses (On and Club) for the sale of alcohol on Saxton Field shall be limited to sports clubrooms and multi-purpose community buildings and will generally be defined in use or occupation agreements. These agreements shall confine alcohol consumption to the building and attached verandas.*

NMH supports *Policy: 4.8.2.5* *The advertising of alcohol shall not be permitted on Saxton Field*. Exposure to advertising in the form of alcohol sponsorship can influence drinking behaviours. The He Ara Oranga report of the Mental Health and Addictions Inquiry spoke of people and communities calling for decisive action to limit the sale and promotion of

alcohol particularly around children and young people. Alcohol (including its promotion) was identified as undermining many aspects of wellbeing and mental health.³

A 2016 systematic review assessing the evidence on the relationship between alcohol sports sponsorship and alcohol consumption found that of seven studies identified, all indicated that exposure to alcohol sports sponsorship is associated with increased levels of consumption and risky drinking amongst schoolchildren and sportspeople.⁴ The majority of New Zealanders support restrictions on alcohol advertising that can be seen or heard by young people. The 2016 Health and Lifestyles Survey found 80% of New Zealanders in favour of increasing restrictions on alcohol advertising or promotion seen or heard by people under 18, while 68% supported banning alcohol-related sponsorship of events that people under 18 may attend.⁵

The evidence demonstrating the harm from alcohol advertising has been previously reviewed by the New Zealand Law Commission and the Ministerial Forum for Alcohol Advertising and Sponsorship in their extensive reports on alcohol related harm in New Zealand. To limit harm to children these reports recommended a reduction of youth exposure to sponsorship and advertising of alcohol.^{6,7} Exposure to alcohol marketing can result in young people drinking earlier in their lives, and drinking larger amounts of alcohol.^{8,9}

B. Smoke and vape-free

NMH sees that there is a provision in 4.9.2.2. that the Council works with Health Promotion Agency to install and maintain appropriate Smoke and Vape Free signs at Saxton Field. NMH recommends that Health Promotion Agency (HPA) is removed and Nelson Marlborough Health is added as it is more common for Councils to work directly with the local health board rather than HPA directly.

NMH supports the Councils smoke and vape free policies. NMH understand the need to limit the risk of fires caused by dispersed smoking activity but suggest that this is only a

³ Mental Health and Addiction Inquiry. 2018 *He Ara Oranga: Report of the Government Inquiry into Mental Health and Addiction*. <https://mentalhealth.inquiry.govt.nz/assets/Summary-reports/He-Ara-Oranga.pdf> (accessed Aug 20, 2019).

⁴ Wagenaar, A. C., Salois, M. J., & Komro, K. A. (2009), *Effects of beverage alcohol price and tax levels on drinking: a meta-analysis of 1003 estimates from 112 studies*. *Addiction*, 104(2), 179–190

⁵ Health Promotion Agency. (2018) *Alcohol-related attitudes overtime: Results from the Health and Lifestyles Survey*. <https://www.hpa.org.nz/research-library/research-publications/alcohol-related-attitudes-over-time-infographic> (accessed Aug 20, 2019).

⁶ New Zealand Law Commission. 2010 *Alcohol in our lives: curbing the harm*. Wellington; NZ

⁷ Ministerial Forum on Alcohol Advertising and Sponsorship. 2014 *Ministerial Forum on Alcohol Advertising and Sponsorship: Recommendations on alcohol advertising and sponsorship*.

⁸ Jernigan D, Noel J, Landon J, Thornton N, Lobstein T. 2017. *Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008*. *Addiction*; 112: 7–20.

⁹ Anderson P, de Bruijn A, Angus K, Gordon R, Hastings G. 2009 *Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies*. *Alcohol*; 44: 229–43.

consideration in the case of events which do not allow pass outs. Only in that instance do we support the provision of a designated smoking area. Our suggested amendment for 4.9.2.3 All events held at Saxton Field will be directed to be smoke and vape free. The only exception to this directive is for events which require a designated smoking area because pass outs for the event are not permitted.

Conclusion

12.NMH thanks the NCC & TDC for the opportunity to feedback into the Saxton Field Reserve Management Plan review.

Yours sincerely



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