



Nelson Marlborough  
**Health**

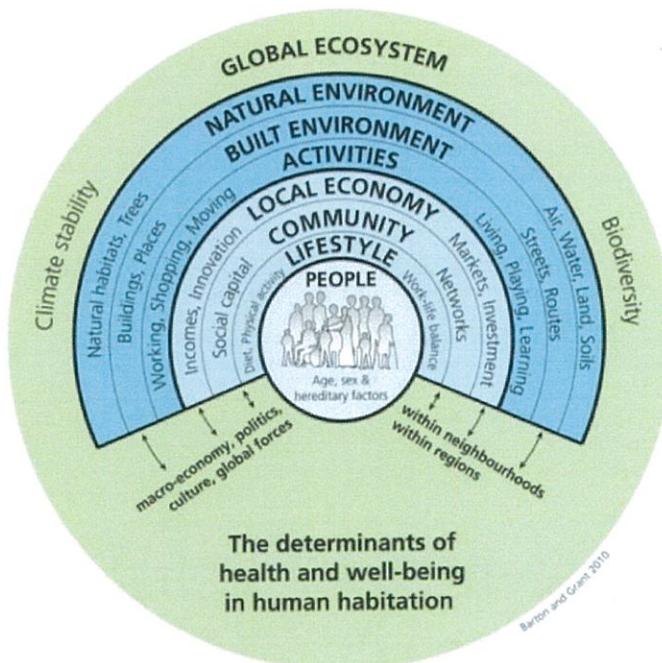
**Submission on  
Marlborough District  
Consultation Document  
for the Long Term Plan  
2021-2031**

**10 May 2021**

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Nelson Marlborough District Health Board (NMDHB) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH along with Marlborough District (MDC) has a responsibility for reducing adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. NMH welcomes the opportunity to comment from a public health perspective on the MDC Consultation Document and supporting information for the Long Term Plan 2021-2031. The Long Term Plan shows a commitment to the long term health and wellbeing of Marlborough residents.

We see it as very important for NMH to continue to work in partnership with MDC around promoting and developing social and physical environments which are likely to contribute to the health, wellbeing and resilience of the local population. The conditions in which people live, work and play are impacted by a range of environmental, social and behavioural factors which are referred to as the 'social determinants of health'. The diagram<sup>1</sup> below shows how the determinants are complex and interlinked.



<sup>1</sup> 2 Barton, H and Grant, M. (2006) A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 126 (6) [http://eprints.uwe.ac.uk/7863/2/The\\_health\\_map\\_2006\\_JRSH\\_article - post\\_print.pdf](http://eprints.uwe.ac.uk/7863/2/The_health_map_2006_JRSH_article - post_print.pdf)

Most of these determinants of health fall outside of the health sector. NMH recognises MDC's crucial role in the health and wellbeing of our population, in particular in the prevention of health problems.

### **Conclusion**

NMH believes that the Marlborough District Council Consultation Document and supporting information on the Long Term Plan 2021-2031 generally identifies key issues and reflects the current needs of the district. The table overleaf page outlines specific areas of the draft Plan that NMH wishes to support and includes a series of recommendations for MDC to consider.

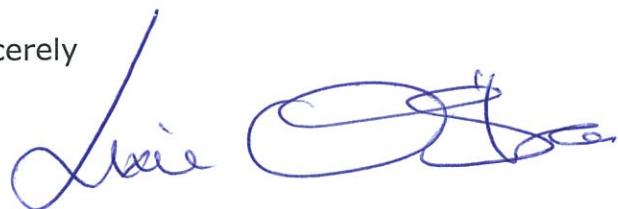
Of particular relevance to this submission, key issues where MDC and NMH can effectively work together are drinking water treatment, waste management, active transport, alcohol related harm, food resilience and housing affordability.

NMH would like to continue working with MDC on these issues.

NMH looks forward to continuing to work in partnership with MDC on activities that will be of direct benefit to the wellbeing and health of the community, and encourages MDC's continued active commitment to leading and investing in social development of our community.

**NMH does wish to be heard** in support of its submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Lexie O'Shea".

Lexie O'Shea  
**Chief Executive**  
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Draft Plan Topic	Discussion	Recommendation / Support	
<b>Community Outcomes</b>	<p>NMH notes that the Draft Long Term Plan consultation document does not include a section on community outcomes. Community outcomes provide a context for the Plan and show how the Council aims to achieve the outcomes in terms of social, economic, cultural, environment interests. The community outcomes can show the strategic direction to the overall plan and give clarity to the public</p>	<p><i>Recommendation:</i> Community Outcomes are included into the Long Term Plan consultation document</p>	
<b>Collaborative work</b>	<p>MDC and NMH has a statutory responsibility to ensuring the wellbeing of communities. NMH would like the opportunity to continue to engage with MDC at a strategic and operational level on work that intersects both organisations.</p>	<p>Marlborough achieved International Safe Community re-accreditation status in December 2020. The group driving the 'Safe and Sound @ the Top' (SAS@TT) Safe Communities is a collaborative network of government and non-government agencies involved in the improvement of safety in the Marlborough region. This model also aligns well with Government Wellbeing Indicators and Frameworks around safety and security. It is acknowledged that MDC and NMH have been involved in and supported the development of this group and its recent international status.</p> <ul style="list-style-type: none"> <li>• <a href="https://treasury.govt.nz/information-and-services/nz-economy/living-standards/our-living-standards-framework/measuring-wellbeing-lsf-dashboard">https://treasury.govt.nz/information-and-services/nz-economy/living-standards/our-living-standards-framework/measuring-wellbeing-lsf-dashboard</a></li> <li>• <a href="https://wellbeingindicators.stats.govt.nz/en/safety/">https://wellbeingindicators.stats.govt.nz/en/safety/</a></li> </ul>	
<b>Transportation</b>	<p>NMH notes that traffic growth has been identified as an issue. NMH encourages MDC to further develop its active and public transport routes to provide people with travel options. This also aligns with the priorities of the current Government Position</p>	<p>NMH supports the following matters shown (Council Feb Meeting, pg. 27, 33)</p>	

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<p>Statement on Land Transport and the recommendations made by the Climate Change Commission.</p> <p>Investment in active transport delivers a range of social, environmental and economic benefits which include reduced congestion, emissions, and increased health and wellbeing. For Marlborough's ageing population, active transport offers people greater transport choice in terms of affordability and accessibility.</p> <p>NMH encourages MDC to explore options for further investment into active transport. This could include funding for the <u>Bikes in Schools</u> programme across the district.</p>	<ul style="list-style-type: none"> <li>• Speed management</li> <li>• Beaver Road Cycleway</li> <li>• Stuart St-Taylor River Path</li> <li>• Dublin St Cycleway</li> <li>• Whale Trail Marlborough Kaikoura</li> <li>• Walking and Mobility Improvements</li> </ul> <p><i>Recommendation:</i> that funding is provided for the Bikes in Schools Programme.</p>	<p><i>Recommendation:</i> that MDC assesses the number and quality of the bike stands in the region.</p> <p><i>Recommendation:</i> that MDC continue planned consultation and trialling of new bus routes with a view to expanding public transport accessibility in the region.</p> <p>In addition, investment in good quality, easily accessible cycle parking is critical to increasing cycling as a mode of transport.<sup>2</sup> Therefore the number and quality of covered bike stands in the area should be assessed to see if it adequately meets demand. Cyclists need to be able to easily lock the frame of the bike directly to the bike stand, many old style racks only allow the front wheel to be locked which is not as secure given that most bikes have quick releases on their front wheels.</p> <p>NMH supports MDC's desire to trial a range of different bus services to work out what suits the needs of the local community. It is worth noting that it does take time for patronage to build up on new routes and if frequency is low, consideration may need to be given to increase bus services rather than removing routes as increasing frequency may make this a more attractive option for bus patrons.</p>
<b>Roading Goals</b>	NMH notes that the Roading Goals makes no reference to the strategic priorities of the Government Policy Statement on Land	

<sup>2</sup> Austroads (2016) *Bicycle Parking Facilities: Guidelines for Design and Installation*, Retrieved from <https://www.onlinpublications.austroads.com.au/items/AP-R527-16>

<b>Draft Plan Topic</b>	<b>Discussion</b>	<b>Recommendation / Support</b>
<i>Infrastructure Strategy pg. 15</i>	Transport (GPS) or the Te Tauihu Regional Land Transport Plan in regards to Safety or Better Travel Options. It is important that these are recognised in the Plan and associated programmes are budgeted for.	
<b>Parking Consultation Document pg. 28</b>	NMH would like to bring MDC's attention to Nelson City Council's consideration of using parking fees to offset expenditure for walking and cycling projects in order to create mode share.	
<b>Innovative Streets</b> 25 Feb Meeting Agenda, pg. 92	NMH supports the Innovative Streets projects as they improve the safety and accessibility of the central business district for pedestrians and cyclists.	<i>Support</i>
<b>Climate Change Infrastructure Strategy pg. 13</b>	NMH is pleased to see the Infrastructure Strategy includes mention of a Carbon Emissions Inventory to assess the current level of emissions and identify opportunities for future reductions. NMH supports this approach because it demonstrates a commitment to delivering on the goals of the Zero Carbon Act. As part of emissions reduction, NMH recommends that MDC consider committing to a food resilience action plan to enable Marlborough residents to access food locally. NMH would support creating an action plan that commits to supporting in increase healthy plant based food consumption and reducing food loss and waste.	<i>Recommendation:</i> MDC work with NMH and local iwi on a food resilience action plan, part of which could be signing up to the <a href="#"><u>C40 Good Food Cities Declaration</u></a>

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<b>Rivers and Flood Protection</b> Infrastructure Strategy pg. 50-60	NMH is supportive of the measures that MDC have put into place to safeguard residents from the risks of flooding and erosion. <ul style="list-style-type: none"> <li>• Undertake a comprehensive review of the Lower Wairau Flood Protection Scheme including climate change scenarios and to consult with the community on the desired levels of flood protection.</li> </ul>	NMH supports the following (Infrastructure Strategy: Rivers and Flood Protection pg. 7) <ul style="list-style-type: none"> <li>• Lower Wairau Flood Protection Scheme including climate change scenarios and to consult with the community on the desired levels of flood protection.</li> </ul>
<b>Water Supply</b> Infrastructure Strategy pg. 21-32.	<p><i>2.1 Drinking Water Standards</i></p> NMH strongly supports the range of projects that will improve the quality of water including the proposed upgrades to the Havelock and Renwick, Wairau Valley treatment plants and the new plant for the Riverlands supply.	<p>NMH strongly supports the preferred option to complete existing water treatment plant upgrades for Blenheim Renwick, Riverlands, Wairau Valley and Havelock and install treatment for each property in Awatere Rural (pg. 26)</p> <p>NMH notes that MDC is aware of government proposals to make residual disinfection of drinking water mandatory e.g. chlorination of existing supplies such as Blenheim.</p> <p>NMH questions MDC's decision to include Drinking-water Standards for New Zealand (DWSNZ) non-compliance as an option into the Infrastructure Strategy given that the Strategy's water supply goals are to comply with the standards. The DWSNZ define the minimum quality standards for drinking water for potable water. Potable drinking water is a fundamental requirement for public health. Consideration for non-compliance is inappropriate and non-compliance could endanger the health of Marlborough residents.</p> <p>With the imminent regulatory changes, NMH recommends that MDC fully comply with whichever set of rules and standards are introduced in the future. Proposed changes to the regulation of</p>

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<p>drinking water will reduce the role that NMH has with regard to drinking water audit and enforcement.</p> <p>Council has highlighted (pg 23, Private Water Schemes) that under proposals in the Water Services Bill Council may have additional responsibilities for about 40 communities surveyed in 2019. NMH notes that additional supplies may be added to this number by Taumata Arowai.</p> <p><i>2.2 Water Availability and Consumption</i></p> <p>NMH supports water metering to reduce average water demand. NMH also supports leakage control, pressure management, public education along with the use of new technologies.</p> <p>NMH notes that an option has been presented to "Amend the <i>Code of Practice for Subdivision</i> to include water saving techniques such as grey water recycling in all new homes."</p> <p>NMH notes the importance of water recycling as the population grows and there are more frequent droughts as a result of climate change. NMH supports the use of greywater or rainwater for gardening, cleaning or toilet/laundry purposes. NMH does not support the use of rainwater or greywater for drinking water purposes unless there are no alternative reticulated option and only where suitable treatment is in place to render the water potable.</p> <p>NMH continues to support investigating alternative water sources for Picton and Havelock</p>		

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<p><b>2.3 Ageing Infrastructure</b></p> <p>NMH supports the implementation of a proactive, planned pipe renewals programme based on criticality in order to avoid unacceptable deterioration of levels of service.</p> <p><b>2.4 Earthquake Risk</b></p> <p>NMH supports prioritising replacement of asbestos cement and cast iron pipes in areas where they have deteriorated in order to make the network more resilient.</p>	<p><i>Fluoridation</i></p> <p>NMH would like to draw the Council's attention to the press release of Hon Dr Verrall (18th March 2021) that states that "<i>The Government is proposing an amendment [the Health (Fluoridation of Drinking Water) Amendment Bill] to see that decision-making sits with the Director-General of Health... The proposed change, which will be made by a Supplementary Order Paper, simplifies the decision making and means we are taking a nationally consistent approach that's based on evidence...</i> Given that fluoridating our drinking water is widely recognised as the single-most important initiative to improve oral health, I expect this Bill to pass this year...Local Councils are responsible for the capital and operational costs of fluoridation"</p>	<p>NMH supports the following (Infrastructure Strategy pg 28)</p> <ul style="list-style-type: none"> <li>• a proactive, planned pipe renewals programme</li> <li>• replacement of asbestos/cast iron pipes</li> </ul> <p>NMH would highlight that the press release states: "<i>There will be funding available to support local councils with fluoridation related infrastructure work.</i>" MDC may wish to note this within the capital planning process.</p>

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<b>Wastewater Infrastructure Strategy pg. 32-42</b>	<p>NMH is pleased to see that MDC's goal is that wastewater treatment plants will fully comply with current and anticipated discharge standards.</p> <p>NMH supports implementing a proactive planned renewals programme to mitigate public health risks from sewage overflows.</p>	<p>NMH supports the following (Infrastructure Strategy: Wastewater pg. 6[37])</p> <ul style="list-style-type: none"> <li>• a proactive, planned renewals programme</li> <li>• Upgrades to Blenheim waste treatment plant; MOPS, Burleigh, Battys Rd, Purkiss pump stations and associated pipelines</li> <li>• Upgrades and renewal of Havelock wastewater treatment plant and pump station</li> <li>• Upgrades to Picton, Renwick, Riverlands, Seddon, St Andrews.</li> </ul>
<b>Stormwater Infrastructure Strategy: pg 43-49</b>	<p>NMH is pleased to see that MDC is continuing to invest in ways to reduce stormwater egress into the wastewater network as contaminated stormwater entering the network may increase the risk to public health (e.g. risk to recreational water users).</p> <p>NMH is supportive of the measures that MDC is initiating to mitigate flood risks including the maintenance of tree plantings for riverbank erosion protection purposes. NMH encourages MDC to also use native plantings to minimise erosion.</p>	<p>NMH supports the following matters (Infrastructure Strategy: Stormwater pg. 6)</p> <ul style="list-style-type: none"> <li>• Implementation of engineering interventions as part of an integrated Stormwater Management Area Plan</li> <li>• Meeting the requirements of the National Policy Statement for Freshwater Management</li> <li>• Installing water quality treatment on new developments and retro-fit treatment to existing stormwater reticulation</li> <li>• a proactive, planned pipe renewals programme</li> </ul>
<b>Fresh water Consultation document pg. 7</b>	<p>NMH supports MDC's commitment to improving freshwater health in the district through a wide variety of programmes including increased monitoring and reporting requirements.</p>	<p>NMH supports additional funding in order to carry out monitoring and reporting obligations under the National Policy statement on Freshwater Management</p>

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<b>Waste Management</b> Consultation document pg. 7	<p>NMH supports the installation of two new weighbridges in order to better report the tonnes of waste and diverted material.</p> <p>NMH would like to work with MDC to reduce the waste produced by healthcare it provides.</p> <p>NMH continues to support the introduction of wheelie bins and the review of kerbside recycling as indicated in the draft Waste Management and Minimisation Plan. NMH supports the investigation of a regional solution for organic material including green, animal and food wastes.</p>	<p>NMH supports the following matters shows in Consultation document pg. 7</p> <ul style="list-style-type: none"> <li>• New weighbridges for waste management</li> </ul> <p><i>Recommends:</i> that consideration is given to adopting a food waste collection service that diverts food from landfill and therefore reduces greenhouse gases</p>
<b>Environment</b> Consultation document pg. 11	<p>NMH supports the monitoring, and investigation of the Coastal Marine Area to enable reporting on the state and trend of Marlborough's natural and physical resources.</p>	<p>Supports</p>
<b>Emergency Management</b> Consultation document pg. 16	<p>NMH supports MDC's approach to emergency management and natural hazard resilience. NMH supports investment into Marlborough's Marae to develop individual emergency preparedness plans in order to increase community resilience and preparedness. In recognition of the COVID Iwi recovery plan, NMH recommend that "Feeding the people" stream is linked to a food resilience action plan</p>	<p>Support</p> <p>Recommend: NMH and MDC work together on responding to the COVID Iwi recovery plan</p>
<b>Community Facilities</b> Infrastructure Strategy pg. 60-65	<p>NMH wants to emphasise the importance of continual investment in community facilities, these are places which can knit communities together by providing a social meeting place.</p> <p>NMH supports the re-development of the Lansdowne Park, Blenheim library redevelopment and Awatere Community Hall.</p> <p>NMH encourages MDC to work closely with the Youth Council and</p>	<p>NMH supports the following matters (Infrastructure Strategy Community Facilities pg. 4)</p> <ul style="list-style-type: none"> <li>• Lansdowne Park Hub Upgrade</li> <li>• Blenheim Library Renewal</li> <li>• Blenheim A&amp;P Park Pavilion</li> <li>• Awatere Community Hall</li> <li>• Extending CCTV and free Wi-Fi</li> </ul>

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	<p>Accessibility groups to ensure that community developments are easily accessible and attractive to all age groups. In the design of community hubs, NMH encourages MDC to include breastfeeding facilities where mothers can have a quiet space to feed their infants.</p> <p>NMH support that Small Townships Programme that enhances towns connectivity, accessibility and unique identities.</p>	<ul style="list-style-type: none"> <li>• Extending the Small Townships Programme</li> <li>• Renwick Museum earthquake strengthening</li> <li>• Increasing and improving public toilets</li> </ul> <p>Recommendation: consideration for the inclusion of breastfeeding facilities and infant changing facilities is included in any redevelopment of community facilities.</p>
<p><b>Parks and active recreation</b></p> <p>Consultation document pg. 14</p>	<p>NMH supports the new reserves going into new developments. This encourages physical activity for people who are less able and also provides more places where people can congregate which is important for mental health. Research has shown that living in areas with walkable green spaces positively influenced the longevity of urban senior citizens, with one particular study showing that the factor of walkable green streets and spaces near the residence significantly and positively influenced the longevity of senior citizens independent of a person's age, sex, marital status and socio economic status<sup>3</sup>.</p> <p>NMH recommends that future reviews of reserves policies include alcohol control and the smoke and vape free policies.</p> <p>Alcohol policies can help to manage any adverse effects of alcohol consumption on reserves.</p>	<p>NMH supports the following matters shown in the (Consultation Document pg 14)</p> <ul style="list-style-type: none"> <li>• New/Upgraded facilities at Grovetown Reserve, Blackmore Place Reserve, Taylor River Reserve and Wither Hills Farm Park</li> <li>• Additional funding for newly established parks, tracks, and facilities</li> <li>• Development of responsible camping site at the Wairau Diversion</li> <li>• Public convenience improvement programme</li> </ul> <p>Recommendation: that MDC includes alcohol and smoke and vape free policies in all reserves policies</p>

<sup>3</sup> Takano T, Nakamura K, Watanabe M. 2002. *Urban residential environments and senior citizens' longevity in megacity areas: the importance of walkable green spaces*. Journal of Epidemiology & Community Health 2002;56:913-918 Retrieved from <http://jech.bmjjournals.org/content/56/12/913.info>

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	<p>Alcohol control policies which serve to limit the users of reserves to exposure to alcohol consumption, advertising and sponsorship can support young people. Research shows that exposure to alcohol marketing for example, can result in young people drinking earlier in their lives and drinking larger amounts of alcohol.</p> <p>It is important to have consideration to alcohol policies when new recreation parks and facilities are developed especially if they contain activities and facilities for youth.</p>	<p>Refer also to our recommendations on Page 16 relating to Reducing Alcohol-harm</p>
<b>Playgrounds</b> <i>25/2 Feb Meeting agenda pg. 95</i>	<p>NMH notes that MDC is investing in playground renewals at Seddon Domain and Pollard Park playground As part of the playground renewals, consideration should be given to increasing the number of shade structures or suitable trees, preferably native, so that people are able to get refuge from the sun in the middle of the day. This is especially important for children in playgrounds to ensure that they have additional sun protection.</p> <p>Consideration should also be given to whether playgrounds have a drinking water fountain. Adequate hydration is important especially in the warmer months. MDC has shown its commitment to the introduction of a sugar sweetened beverages policy whereby sugar sweetened beverages are not provided or made available for purchase at council-owned buildings and events.</p> <p>Increasing the number of drinking fountains is another way that MDC can contribute to the health and wellbeing of its citizens by giving people the option of free easily accessible water in public places. In addition, signage for water fountains should be added.</p>	<p>NMH supports renewals to Seddon Domain and Pollard Park playgrounds</p> <p><i>Recommendation:</i> that MDC looks at the amount of shading in playgrounds in the region</p> <p><i>Recommendation:</i> that MDC reviews the number of water fountains available in playgrounds.</p> <p><i>Recommendation:</i> that signage is provided for water fountains.</p>

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	<p>NMH supports the inclusion of playgrounds into the new subdivision developments as this provides more opportunities for children to play and exercise, as well as providing for a social meeting point for communities.</p>	<p><i>Support:</i> Council-led development of "affordable" housing or apartments on Council-owned land be investigate and a feasibility and funding options report be prepared. (25/2 Minutes pg. 70)</p> <p><i>Recommendation:</i> universal design of a proportion of housing is incorporated into the aforementioned feasibility report</p> <p><i>Support:</i> construction of 12 new Senior Housing units</p>
<b>Housing</b> 25 Feb Council Agenda pg. 69-85	<p>NMH supports the continued funding for housing for seniors and the development of more units. NMH supports retaining rents at an affordable level for new tenets.</p> <p>Housing affordability and availability has become an issue in Marlborough. The expense of housing can put families into poverty, and poverty is an important determinant of health, therefore NMH supports the development of policies that provide affordable good quality housing as an important for public health. Although housing generally reflects rather than creates socio-economic position, affordability has an influence in terms of:</p> <ul style="list-style-type: none"> <li>• access to quality housing,</li> <li>• where people live and thus social and economic opportunities,</li> <li>• home ownership and the benefits of stability that this offers, and</li> <li>• income available for other needs such as food, heating and health care.</li> </ul>	<p>NMH believes that allowing the intensification of brownfield locations, close to amenities and services, is necessary in providing for the region's ageing population to "age in place" (live at home into your older years). Older persons generally state a strong preference for living in their own home or non-institutional community settings. Dwellings have long lifetimes and at some</p>

Draft Plan Topic	Discussion	Recommendation / Support
	<p>stage in a dwelling's life it will be either occupied or visited by someone with mobility issues. Universal design ensures a home is sustainable and can be adapted to meet the life-time needs of the resident. A community trial in Taranaki has shown that the adoption of universal design modifications have resulted in an estimated 26% reduction in the rate of injuries caused by falls at home per year in those houses where modifications have been made.<sup>4</sup> BRANZ research<sup>5</sup> has shown that it is considerably cheaper and less disruptive to incorporate universal design features into a new build than retrofit the same house later. Therefore NMH supports Council-led department of housing especially in regards to infill/CBD development as this enables people to have easy access to services and facilities.</p> <p>NMH recommends that new housing developments are required to incorporation of universal design standards within a certain proportion of developments.</p>	<p>Recommend that MDC works closely with NMH to develop a broader smokefree policy</p>
<b>Smokefree Environments</b>	<p>NMH has been working closely with Nelson City Council to develop a Smokefree Outdoor Policy where smoking is banned from:</p> <ul style="list-style-type: none"> <li>• Council events</li> <li>• Council buildings and facilities, carparks and bus stops,</li> <li>• Town Centre</li> <li>• Beaches</li> </ul>	

<sup>4</sup> Keall MD, Nevil P, Howden-Chapman P et al. 2014. *Home modifications to reduce injuries from falls in the home, injury prevention study: A cluster-randomised controlled trial*. Otago University, Massey University and Building Research Association New Zealand

<sup>5</sup> Stuff. 2016. *No houses available for disabled New Zealanders*. Accessed 16 November <http://www.stuff.co.nz/national/health/82528058/no-houses-available-for-disabled-new-zealanders>

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<ul style="list-style-type: none"> <li>• Walkways and Cycleways</li> </ul>	<p>The draft policy will be presented to Nelson Council this year for approval. These policies have been rolled out in numerous Councils over the past three years.</p> <p>NMH would like to work with MDC staff to introduce a similar policy as reducing the prevalence of smoking and de-normalising smoking behaviour is one way the Council can improve the health and wellbeing of Marlborough communities.</p>	<p><b>Reducing Alcohol-harm</b></p> <p>Intoxication with alcohol<sup>6</sup> is the main cause of alcohol-related harm in New Zealand society, leading to risk-taking behaviour, road traffic and other accidents, injuries from falls and drowning, assaults, self-inflicted injury, and acute alcohol poisoning.</p> <p>There are social costs from the use and abuse of alcohol, to drinkers themselves, to others they come into contact with, and to the whole of New Zealand society. Costs range from avoidable morbidity and mortality, hospital presentations, aggression and violence, and crime, to harmful effects on family relationships, friendships and social life, schooling, study and employment opportunities, and financial problems.</p> <p>NMH recommends that MDC continues to implement a Local Alcohol Policy for the region that covers the following matters:</p>

<sup>6</sup> <https://www.sialliance.health.nz/UserFiles/SouthIslandAlliance/File/PDFs/DHBPositionStatementFINAL08%2003%2012.pdf>

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<p><b><i>Partnership with iwi and Maori</i></b></p>	<ul style="list-style-type: none"> <li>a) Distances between sensitive sites e.g. early childhood centres, schools, alcohol rehabilitation clinics and the location for new outlets.</li> <li>b) Density of existing venues</li> <li>c) Effects of late night licensed premises on the surrounding environment.</li> </ul>	<p>NMH notes that whilst there is a separate statement relating to Maori and decision making, the Consultation document does not explicitly mention strengthening iwi and Māori participation in Council decision making. This is important that this is embedded into all Council documentation in order to have effective and meaningful partnerships with iwi.</p> <p>Recommendation: that the Plan outlines MDC's commitments in relation to working in partnership with local iwi.</p>